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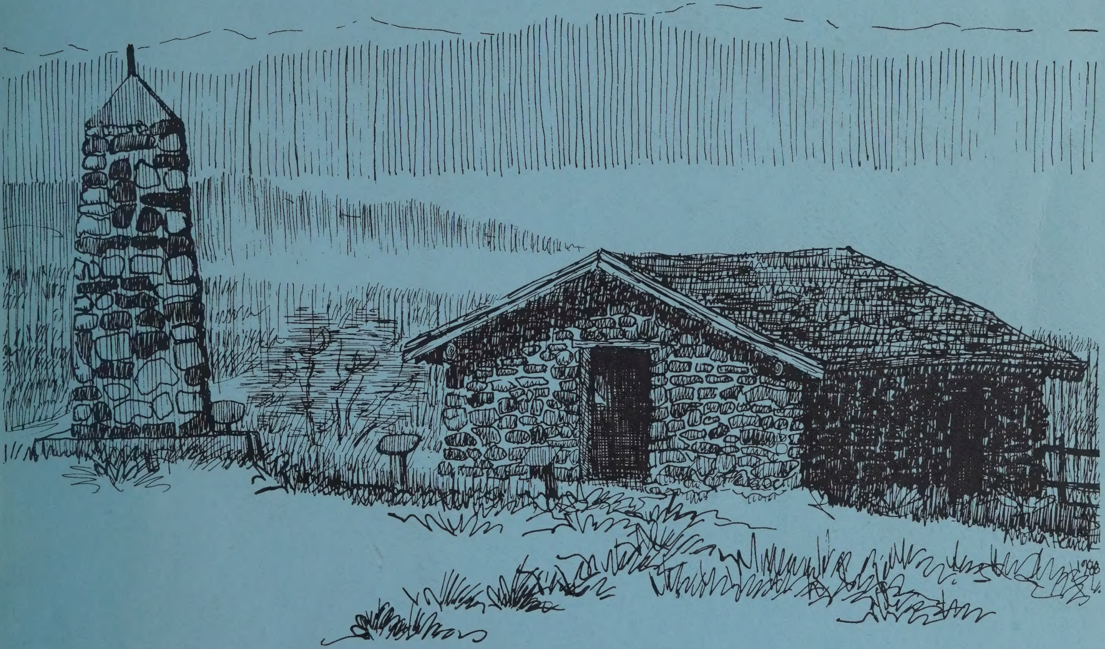
PROPOSED PONY EXPRESS RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT



SALT LAKE DISTRICT

REAU OF LAND MANAGEMENT

. DEPARTMENT OF THE INTERIOR

SEPTEMBER, 1988

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IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
SALT LAKE DISTRICT OFFICE
2370 South 2300 West
Salt Lake City, Utah 84119

1610 (U-020)

Dear Public Land User:

Enclosed is the proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) for the Pony Express Resource Area. The Salt Lake District, Bureau of Land Management has prepared this document in conformance with the requirements of the Federal Land Policy and Management Act of 1976 and the National Environmental Policy Act of 1969.

This Proposed RMP are designed to be used in conjunction with the Draft RMP/EIS published in May 1988. This document contains the proposed plan along with revisions and corrections pertaining to the Draft RMP/EIS, public comments received, and BLM's responses to these comments.

The State Director shall approve the RMP no sooner than 30 days after the Environmental Protection Agency has published notice of receipt of the Final EIS in the Federal Register. Persons desiring to protest proposed decisions in this document must submit written protests to the Director, Bureau of Land Management (Department of Interior, Bureau of Land Management, 18 and C Streets, NW, Washington, D.C. 20240) within 30 days of the filing of the document with the Environmental Protection Agency. All protests must be received within the time limit allowed and must conform to the requirements of 43 CFR 1610.5-2. The Final Resource Management Plan will be completed with a Record of Decision.

I want to personally thank those who participated in the development of this plan. I hope your involvement will continue as we move into the implementation and monitoring phases of the plan and develop activity plans in specific programs.

Sincerely yours,

Deane H. Zeller

Deane H. Zeller
District Manager

#18759335

ID: 88076629

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PROPOSED
PONY EXPRESS RESOURCE MANAGEMENT PLAN
AND
FINAL
ENVIRONMENTAL IMPACT STATEMENT

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Prepared by
Department of the Interior
Bureau of Land Management
Salt Lake District

James M Parker
State Director
Utah State Office

Abstract: This Proposed Resource Management Plan and Environmental Impact Statement, when combined with the Draft Environmental Impact Statement, describe and analyze four alternatives for management of public lands and resources in the Pony Express Resource Area. The proposed plan is patterned after alternative 2. It focuses on resolving three planning issues but also addresses all resource programs. When the Resource Management Plan becomes final, it will provide a comprehensive management framework for the public lands and resources in the Pony Express Resource Area.

For more information contact:
Dennis Oaks, Team Leader
Salt Lake District Office
2370 South 2300 West
Salt Lake City, Utah 84119
(801) 524-6767

Protests on the Draft RMP/EIS are due 30 days after the filing of this document with the EPA.

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HOW TO USE THIS DOCUMENT

This document consists of three sections: the Summary, the Proposed Resource Management Plan (RMP), and the Final Environmental Impact Statement (EIS). It is intended that this document be used together with the Draft RMP/EIS.

The Summary reviews the development of this document and the previously published Draft RMP/EIS. The Summary also highlights the major actions found in the Proposed RMP portion of this document.

The Proposed RMP includes the decisions which would be required for each resource program. The maps represent the proposed decisions. Any differences between the preferred alternative in the Draft RMP/EIS and the Proposed Plan are noted.

The Final Environmental Impact Statement includes public comments and responses, and revisions and corrections of the Draft RMP/EIS.

Summary

Introduction

The following summary briefly reviews the development of this document and its companion volume, the Draft Pony Express Resource Management Plan and Environmental Impact Statement. The information presented in this document is organized in two sections, the Proposed Resource Management Plan and the Final Environmental Impact Statement. The purpose of this organization is to focus attention on the management decisions that are being proposed for the Resource Area. In response to both public comments and internal review, changes have been made and noted.

Issues

Three major issues were addressed in the Pony Express Resource Management Plan. These issues were identified based on recommendations from the public, BLM resource specialists and managers, and other governmental agencies. The issues identify which counties are affected.

Issue 1: Landownership Adjustments (Tooele and Utah Counties)

Adjustments in landownership are appropriate in parts of the Resource Area to achieve more efficient management and utilization of public resources. A demand exists for certain public lands to be made available for disposal or exchange.

Needed decisions include:

- What public lands should be retained in public ownership?
- What public lands should be disposed?
- Where is access needed to improve resource management?

Issue 2: Off-Road Vehicle Use (Tooele and Utah Counties)

The public lands in the PERA provide an opportunity for off-road vehicle (ORV) use for individuals and organized groups. The Resource Area is becoming more popular with ORV users. BLM must analyze the demand for ORV use in relation to its accessibility and its effects on the land and other resource values. Appropriate levels of motorized recreation use in known or potential conflict areas must be determined.

Needed decisions include:

- What portions of the Resource Area should be designated as closed, limited, or open to ORV use?

Issue 3: Vegetation Management in Utah County

As a result of a suit filed in Federal court in 1973 by the Natural Resources Defense Council, et al, BLM must site-specifically analyze the impacts of livestock grazing on public lands. A Grazing Environmental Impact Statement was prepared for Tooele County and a small portion of Utah County in 1983. This RMP/EIS meets the court requirement for analysis of livestock grazing in the remainder of Utah County.

Needed decisions include:

- How should the grazing allotments be managed?
- How should forage be distributed?

The following topic has been identified as a management concern for the Pony Express Resource Area:

Mineral Development (Tooele and Utah Counties)

It is BLM's continuing mineral resource policy to "foster and encourage...the orderly and economic development of domestic mineral resources." Opportunities exist within the PERA to develop minerals under the principles of balanced, multiple-use management while protecting other resources.

Needed decisions include:

- Which areas should be open for mineral exploration and development?
- Which areas should be withdrawn from mineral entry, or can impacts be mitigated by other, less restrictive means?
- How should the area be categorized for mineral leasing?

Alternatives Considered in the Draft RMP/EIS

Four alternatives were considered in detail in the Draft RMP/EIS. Within each alternative, a complete resource management plan which described both issues and non-issue related resource programs was analyzed. The four alternatives are briefly described below.

Alternative 1

This alternative described the current managment in the Resource Area. Since it did not include any changes in current management, it was identified as the "no action" alternative.

Alternative 2

This alternative provided for development of resources while protecting or enhancing environmental values. This alternative was identified as BLM's preferred alternative in the Draft RMP/EIS. It resolved issues in the most balanced manner.

Alternative 3

This alternative gave priority to resource use and commodity production (mineral development, livestock grazing, motorized recreation, etc.). Other resources would be protected to the extent required by laws, executive orders, and other mandates.

Alternative 4

This alternative gave priority to protection or enhancement of environmental values (e.g. wildlife, watershed, aesthetics, non-motorized recreation). Resource use and commodity production would be allowed to the extent they would be compatible with the nondevelopment uses.

Proposed Pony Express Resource Management Plan

Introduction

This plan contains the proposed decisions for management of public lands in the Pony Express Resource Area. Changes between the preferred alternative of the Draft RMP and the Proposed Plan are noted. A rationale for each proposed decision is also provided. This plan does not contain information on environmental consequences. This information is found in the Draft RMP/EIS, with changes as noted.

Lands Program

Proposed Decision 1

Identify lands as follows:

	Acres
Unavailable for disposal or other adjustment	441,820
Available for exchange only	1,581,962
Disposal	8,924

A total of 47 tracts would be available for disposal. These are listed in Table 1 and 2 and shown in Figure 1. All parcels would be managed for disposal under all available authorities except tracts 13, 69, and 70, which would not be available for Section 203 sales.

Fourteen parcels would be available for disposal subject to certain restrictions on persons or purposes under which a disposal would occur. Table 3 identifies these parcels and applicable limitations.

Rationale

In Section 203 of the Federal Land Policy and Management Act of 1976, Congress has allowed the disposal of public land when such tract, because of its location or other characteristics, is difficult and uneconomical to manage as part of the public lands and is not suitable for management by another Federal department or agency.

Forty-four tracts meet the criteria for disposal under all available authorities (see Table 2) including Section 203 sales. These include one tract (4A) added to the identified disposal areas. This 65-acre tract was not included in the Draft RMP/EIS. No significant environmental consequences would result if tract 4A were disposed. The remaining three tracts could be disposed under all available authorities except 203 sales.

Tracts that may be suitable for management by another Federal agency and otherwise meet the disposal criteria have been separately identified and will be disposed of only after the adjoining Federal agency has indicated a lack of interest in them. Tracts that may be suitable for management by another Federal agency but otherwise do not meet the disposal criteria will be retained by BLM if the adjoining Federal agency is not interested in acquiring them.

Four tracts were dropped from the preferred alternative in the Draft RMP/EIS based upon new information received from the State of Utah (see Comment Letter 22). Tracts 36 and 37 contain important sage grouse habitat. Tracts 94 and 95 contain high priority big game habitat and crucial deer winter range, respectively.

Proposed Decision 2

A total of 441,820 acres of public lands are not available for disposal or any other transfer from Federal ownership and BLM management. These lands are identified in Table 4 and shown in Figure 2. BLM must amend the RMP before any of the areas could be disposed, transferred to another agency, or exchanged.

Rationale

These lands have high public value and include critical or crucial wildlife habitats, wilderness study areas, existing and proposed Areas of Critical Environmental Concern (ACECs), significant water resources, recreation areas, highly scenic areas, and areas with facilities and improvements. A complete description of the areas is found in Appendix 2 of the Draft RMP/EIS.

Proposed Decision 3

The remaining public lands (1,581,962 acres) in the Pony Express Resource Area (including revoked withdrawals returned to BLM administration) are available for exchange.

In order to be considered, exchanges of public land in the Pony Express Resource Area must accomplish one or more of the following criteria:

(1) Increase public ownership within those areas of public land which are not available for disposal or any other transfer from Federal ownership and BLM management (see Table 4 and Figure 2).

(2) Result in a net gain of significant resource values on public land such as important wildlife habitat, cultural sites, riparian zones, live water, and threatened and endangered species.

(3) Improve the accessibility of the public lands.

(4) Contribute toward more efficient management of public lands through consolidation of

Table 1

LANDS IDENTIFIED FOR DISPOSAL

Parcel No.	Legal Description	Acres
2.	T. 1S., R. 19W.,	
	Section 3, Lots 1 & 2	81.2
4.	T. 9S., R. 19W.,	
	Section 10, S½SW¼SW¼NE¼	5.0
4A.	T. 8S., R. 19W.,	
	Section 9, E½E½E½SW¼, E½E½E½W½E½SW¼	
	Section 10, W½W½W½SW¼, E½SW¼NW¼SW¼, E½W½SW¼SW¼, W½E½SW¼SW¼, SE¼SE¼SW¼SW¼	65.0
6.	T. 10S., R. 19W.,	
	Section 3, N½SW¼ of Lot 2	5.0
8.	T. 6S., R. 18W.,	
	Section 7, SE¼NE¼	40.0
	Section 8, S½N½, NE¼NE¼	200.0
	Section 9, W½NW¼	80.0
		320.0
11.	T. 1S., R. 13W.,	
	Section 13, E½SE¼, E½W½SE¼	160.0
	Section 24, N½N½NE¼	
13.	T. 3S., R. 8W.,	
	Section 22, NW¼NW¼SE¼	10.0
14.	T. 6S., R. 8W., Section 34, NE¼NE¼, N½	360.0
17.	T. 6S., R. 7W.,	
	Section 3, S½N½, SE¼	320.0
	Section 4, SE¼NE¼	40.0
	Section 10, NE¼NE¼	40.0
		400.0
20.	T. 1S., R. 6W.,	
	Section 29, SW¼SW¼	40.0
21.	T. 2S., R. 6W.,	
	Section 7, Lot 6	37.3
	Section 18, Lot 11	26.8
		64.1

Table 1, continued

Parcel No.	Legal Description	Acres
22.	T. 2S., R. 6W.,	
	Section 14, NE¼SW¼	40.0
26A.	T. 8S., R. 5W.,	
	Section 19, Lot 3: E½NE¼	5.0
29.	T. 6S., R. 5W.,	
	Section 27, NE¼SW¼	40.0
31.	T. 6S., R. 5W.,	
	Section 5, NE¼SW¼, SW¼NW¼, W½SW¼, NW¼SE¼	200.0
	Section 6, E½SW¼, SE¼	240.0
		440.0
35.	T. 4S., R. 5W.,	
	Section 31, Lots 3 & 4: SE¼, E½SW¼	315.0
	Section 32, SW¼SW¼	40.0
		355.0
43.	T. 6S., R. 4W.,	
	Section 10, Lots 3, 9 & 10	117.9
44.	T. 9S., R. 4W.,	
	Section 15, NW¼SW¼	40.0
45.	T. 9S., R. 4W.,	
	Section 21, N½SW¼, SE¼NW¼	120.0
46.	T. 9S., R. 4W.,	
	Section 21, E½E½	160.0
49.	T. 8S., R. 3W.,	
	Section 25, SW¼SW¼	40.0
51.	T. 8S., R. 3W.,	
	Section 9, Lots 5-7	81.1
52.	T. 6S., R. 3W.,	
	Section 35, Lot 4	15.9

Table 1, continued

Parcel No.	Legal Description	Acres
53.	All public lands within these sections.	
	T. 5S., R. 3W.,	
	Section 31, Lots 1-26	243.6
	T. 6S., R. 3W.,	
	Section 4, Lots 1-4, 7-12	203.2
	Section 5, Lots 1, 3-5, 7, 10-21	42.2
	Section 6, Lots 1, 4-7, 17-25	142.8
	Section 7, Lots 1-4, 8, 11-16, 20	221.5
	Section 8, Lots 2, 7, 10-12, 14-17	16.1
	Section 9, Lots 2-7, 9-21	74.4
	Section 16, Parts of Lots 3, 8 & 18	77.0
	Section 17, Parts of Lots 1-4, 6-8, 10, 11, 13: W½SW¼, Sw¼NW¼	349.0
	Section 20, Parts of Lots 1-16: W½W½	444.0
	Section 21, Parts of Lots 2, 4, 6-16	214.0
		2027.8
69.	T. 6S., R. 2W.,	
	Section 7, NE¼NW¼, N½NE¼, N½S½NE¼	100.0
70.	T. 4S., R. 1W.,	
	Section 19, Lot 20	39.7
	Section 20, NW¼SW¼	40.0
	Section 29, N½SW¼, S½NW¼	160.0
	Section 30, Lots 1-4, E½W½, E½	138.9
	T. 4S., R. 2W.,	
	Section 25, Lots 1, 4-6: N½SW¼, NW¼, NW¼SE¼	385.1
	Section 26, Lots 5-7	71.7
	Section 29, Lot 3	52.6
	Section 33, NW¼NW¼	40.0
		927.4
71.	T. 10S., R. 2W.,	
	All public lands within the township.	Approx. 800.0
	T. 10S., R. 3W.,	
	Sections 1, 12, 13, 24-26, All public lands within these sections.	Approx. 100.0
		900.0
72.	T. 7S., R. 1W.,	
	Section 28	640.0
73.	T. 7S., R. 1W.,	
	Section 26, N½NW¼, NW¼NE¼	120.0

Table 1, continued

Parcel No.	Legal Description	Acres
74.	T. 7S., R. 1W.,	
	Section 17, NE¼SE¼	40.0
75.	T. 7S., R. 1W.,	
	Section 6, SE¼SW¼	40.0
76.	T. 6S., R. 1W.,	
	Section 25, SW¼NW¼	40.0
77.	T. 6S., R. 1W.,	
	Section 20, SW¼NW¼	40.0
78.	T. 5S., R. 1W.,	
	Section 29 SE¼SE¼	40.0
79.	T. 4S., R. 1E.,	
	Section 15, Lots 3 & 4	14.2
80.	T. 8S., R. 1E.,	
	Section 15, NW¼	160.0
81.	T. 9S., R. 1E.,	
	Section 8, E½SE¼NW¼	20.0
82.	T. 9S., R. 1E.,	
	Section 22	Approx. 5.0
83.	T. 9S., R. 1E.	
	Section 27, E½SW¼SW¼, SE¼SW¼, NE¼SE¼, S½SE¼	180.0
	Section 34, N½NE¼, W½SW¼NE¼, W½E½SW¼NE¼	110.0
		290.0
92.	T. 10S., R. 3E.,	
	Section 1, Lot 1	8.7
98.	T. 10S., R. 6E.,	
	Section 34, SW¼SE¼	40.0
101.	T. 11S., R. 7E.,	
	Section 27, Lot 3	37.4

Table 1, continued

Parcel No.	Legal Description
102.	T. 11S., R. 8E., Section 6, SW¼NW¼
105.	T. 11S., R. 9E., Section 30, NW¼SE¼
107.	T. 1S., R. 1E., Section 24, NE¼SE¼, E½E½NW¼SE¼
108.	T. 1S., R. 1E., Section 13, N½SW¼SW¼
109.	T. 1S., R. 1E., Section 24, SW¼SW¼NE¼, All Public Land in the NW¼SW¼NE¼, W½W½NW¼SE¼, NE¼SW¼, NW¼SE¼SW¼

GRAND TOTAL 8

TABLE 2
AVAILABLE DISPOSAL AUTHORITIES AND SURFACE-USE ASSUMPTIONS FOR DISPOSAL PARCELS
PART 1: AVAILABLE DISPOSAL AUTHORITIES

MANAGE FOR DISPOSAL UNDER ALL AVAILABLE AUTHORITIES, INCLUDING FLPMA SEC. 203 SALES BY PARCEL NUMBER	MANAGE FOR DISPOSAL UNDER ALL AVAILABLE AUTHORITIES EXCEPT FLPMA SEC. 203 SALES BY PARCEL NUMBER
2	
4	
4a	
6	
8	
11	
	13
14	
17	
20	
21	
22	
26a	
29	
31	
35	
43	
44	
45	
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79	
80	
81	

TABLE 2 (Continued)
AVAILABLE DISPOSAL AUTHORITIES AND SURFACE-USE ASSUMPTIONS FOR DISPOSAL PARCELS
PART 1: AVAILABLE DISPOSAL AUTHORITIES

MANAGE FOR DISPOSAL UNDER ALL AVAILABLE AUTHORITIES, INCLUDING FLPMA SEC. 203 SALES BY PARCEL NUMBER	MANAGE FOR DISPOSAL UNDER ALL AVAILABLE AUTHORITIES EXCEPT FLPMA SEC. 203 SALES BY PARCEL NUMBER
82	
83	
92	
98	
101	
102	
105	
107	
108	
109	

TABLE 2
AVAILABLE DISPOSAL AUTHORITIES AND SURFACE-USE ASSUMPTIONS FOR DISPOSAL PARCELS
PART 2: SURFACE - USE ASSUMPTIONS BY PARCEL NUMBER

AGRICULTURE	MINERAL DEVELOPMENT	COMMUNITY/ PUBLIC PURPOSE	NO SURFACE CHANGE
		2	
		4	
4a			4a
		6	
8			
		11	
		13	13
14			
		17	
			20
			21
			22
		26a	26a
35			35
		43	43
		44	44
			45
			46
			49
			51
	52		52
	53		
		69	
			70
	71		
		72	72
			73
			74
			75
			76
			77
			78
			79
80			
81			
82			
		83	83
			92
			98

TABLE 2 (Continued)
AVAILABLE DISPOSAL AUTHORITIES AND SURFACE-USE ASSUMPTIONS FOR DISPOSAL PARCELS
PART 2: SURFACE - USE ASSUMPTIONS BY PARCEL NUMBER

AGRICULTURE	MINERAL DEVELOPMENT	COMMUNITY/ PUBLIC PURPOSE	NO SURFACE CHANGE
		101	101
			102
		105	105
		107	
		108	
		109	

TABLE 3
PARCELS AVAILABLE FOR DISPOSAL SUBJECT TO LIMITATIONS ON PERSONS AND/OR PURPOSES

Parcel	Persons To	Purposes For
2	Wendover City	Landfill
4	Tooele County	Landfill
6	Tooele County	Landfill
8	Adjacent Landowner	Any
13	Iosepa Historical Association	Historic Site
26a	Tooele County	Landfill
53	Adjacent Landowners or Mining Claimants	Any
69	City of Cedar Fort	Watershed and Recreation
70	Dept. of Defense	Military Reservation
71	Adjacent Landowners or Mining Claimants	Any
98	Forest Service	National Forest Land
107	Salt Lake City or Forest Service	Municipal Watershed
108	Salt Lake City or Forest Service	Municipal Watershed
109	Salt Lake City or Forest Service	Municipal Watershed

TABLE 4

LANDS NOT AVAILABLE FOR OWNERSHIP ADJUSTMENT

	Area	Acreage
1.	Bonneville Salt Flats	30,680 acres
2.	Deep Creek Area	28,260 acres
3.	Knolls Area	36,160 acres
4.	Cedar Mountains Area	74,680 acres
5.	Dugway/Riverbed	132,000 acres
6.	Simpson Springs	640 acres
7.	Simpson Mt./Onaqui Mt./Big Hollow	114,560 acres
8.	White Rocks	640 acres
9.	Salt Mountain	6,480 acres
10.	Horseshoe Springs	760 acres
11.	North Stansbury Mountains	12,000 acres
12.	Rush Lake Area	1,120 acres
13.	Clover Reservoir Area	1,280 acres
14.	Ophir Canyon Area	2,560 acres
	TOTAL	441,820 acres

ownership.

(5) Remove from Federal ownership public lands which have lost all significant public values due to on site or adjacent uses.

Land exchanges will continue to be analyzed on a case-by-case basis. Resource values may be incorporated into the fair market value of the land.

Rationale

Exchanges would allow the readjustment of ownership patterns without a net loss of Federal ownership or natural resource values if they are accomplished under the criteria listed above. The criteria, as stated in the proposed decision, represent overwhelming factors in each exchange proposal. Current BLM policy favors large exchanges that result in a significant benefit to the public.

Proposed Decision 4

Military exercises are discouraged because they tend to preclude multiple use activities and public access. Military activities that result in significant, adverse, long-term impacts or public safety hazards would not be allowed.

BLM will continue to approve military requests for casual use for which no formal authorization is required. Examples of these types of requests are temporary placement of communication equipment along existing roads, search and rescue training involving helicopters and foot patrols, and temporary observation posts.

BLM will continue to consider requests for long-term military uses involving construction or development of facilities. These uses are appropriately authorized under 43 CFR 2800 and include radar or microwave communications sites, and linear facilities, such as roads, power lines, and communication lines.

For requests made by the Utah National Guard, BLM can issue a permit under 43 CFR 2920. For uses such as a bivouac of troops and off-road travel, requests would be considered through the environmental assessment process to determine the significance of impacts. Public land will not be made available for inappropriate uses such as storage or use of hazardous materials (munitions, fuel, chemicals, etc.) and live artillery firing.

Rationale

BLM is mandated to manage the public land for multiple resource uses. Some military uses directly conflict with this mandate, while others such as casual use can be permitted without affecting other interests. The environmental assessment process will determine the potential significance of impacts from military proposals in cases where the conflicts cannot be immediately ascertained.

Proposed Decision 5

In the Pony Express Resource Area, BLM withdrawals will continue for public water reserves and power sites. BLM will also continue to pursue withdrawal action on 30,682 acres within the Bonneville Salt Flats, and 709 acres at Simpson Springs Recreation Area (see Figure 3). If not designated wilderness by Congress, the North Deep Creek Mountains will be evaluated for possible withdrawal action.

Revocation action will be pursued for the Federal Aviation Agency's withdrawal of 339 acres of public land in Tooele County, subject to FAA's request for relinquishment. Following revocation, the agency's two navigation sites would be authorized by rights-of-way.

Rationale

The proposed withdrawals would help protect several valuable resources in the PERA, including rare and unique geologic resources on the Bonneville Salt Flats, important recreation and cultural values at Simpson Springs, and water sources.

If the North Deep Creek Mountains are not designated as a wilderness area by Congress, this area should be reviewed to determine whether any of the resources present should be protected by a withdrawal.

Authorization of FAA's navigation sites by rights-of-way would reserve the land necessary for operation of facilities and would not encumber any unneeded land.

Proposed Decision 6

Acquisition of private lands will be subject to the same criteria as those discussed under Proposed Decision 3.

BLM will pursue acquisition of the following lands in the vicinity of Rush Lake (also see Figure 4).

T. 4S., R. 5W.	
Section 27, Lots 6, 9, 10 and 13	(155 acres)
Section 34, S½SE¼, NE¼SE¼,	(120 acres)
Section 35, W½W½, NE¼SW¼	(200 acres)
T. 5S., R. 5W.	
Section 2, W½NW¼	(80 acres)
Section.3, E½,E½W	(480 acres)

Rationale

BLM periodically has a need to acquire lands or interests in other lands. Use of the criteria will allow BLM to acquire lands to increase its management efficiency and administration of lands with high public values.

Acquisition of the lands identified at Rush Lake would consolidate ownership and allow BLM to better implement its management objectives for these areas.

Proposed Decision 7

BLM will acquire and/or legalize access to the following areas (also see Figure 4).

Area	Preliminary Route Identified
Barlow Creek	T. 5 S., R. 7 W. Sections 31 and 32 (through)
	T. 6 S., R. 7 W. Section 6 (through)
Clifton Flat	T. 8 S., R. 17 W. Sections 16 and 17 (through)
	T. 8 S., R. 18 W. Sections 23 and 24 (through)
Rocky Canyon	T. 10 S., R. 19 W. Section 22 (through)
Farnsworth Peak	T. 2 S., R. 4 W. Sections 13 and 14 (through)
Onaqui Mountains	T. 6 S., R. 6 W. Section 16 (through)
	T. 7 S., R. 6 W. Section 2 (through)
	T. 6 S., R. 7 W. Sections 35 and 36 (through)
Sheep Rock/ Simpson Mountains	T. 9 S., R. 7 W. Sections 7, 18, 19, and 30 (through)
	T. 9 S., R. 8 W. Sections 32-34 and 36 (through)
	T. 10 S., R. 7 W. Sections 5, 17, 18, and 20 (through)
Knolls Recreation Area	T. 1 S., R. 13 W. Sections 14 and 23
West Mountain	T. 9 S., R. 1 E. Section 14, NW¼
Kyune/Reservation Ridge	T. 11 S., R. 9 E. Section 23, Section 26, (through) Section 35
Tooele County	
Broad Canyon (East side of Stansbury Mtns.)	T. 2 S., R. 6 W. Section 7-9 (through)
Bates Canyon	T. 2 S., R. 4 W. Sections 25 and 26 (through)
Stansbury Island gravel pit	T. 1 N., R. 6 W. Section 28
Salt Mountain Area (West side of Stansbury Mountains)	T. 2 S., R. 7 W. Section 31
	T. 2 S., R. 8 W. Sections 25 and 35
	T. 3 S., R. 7 W. Section 7
	T. 3 S., R. 8 W. Sections 1, 2, and 12

Rationale

Access is a vital part of BLM's multiple use management scheme. This decision will allow BLM to obtain access over existing roads to areas of important resource values and/or developed facilities. The routes identified above are preliminary. BLM will conduct a route analysis to determine if an acceptable route across public land is available. If an acceptable route across public land is available, access across public land will not be required.

Minerals Program

Proposed Decision 1

BLM will continue to process applications for the removal of common variety mineral materials, including sand and gravel, on a case-by-case basis as regulated under 43 CFR 3600. Stipulations to protect surface values will be required based on review of each proposal.

Rationale

This is BLM's current policy for managing common variety minerals in the Pony Express Resource Area and was part of the Features Common to All Alternatives section in the Draft RMP/EIS.

Proposed Decision 2

Categorize the Federal mineral estate in the Pony Express Resource Area for fluid mineral leasing as follows:

	Acres
Category 1 (open)	1,750,735
Category 2 (open with special stipulations)	245,857

Category 3 (no surface occupancy)	77,003
Category 4 (closed)	0

Table 5 describes the areas and/or resources included in the fluid mineral leasing categories. These areas are shown in Figure 5.

The following special stipulations used in Category 2 are in addition to the lease terms and standard stipulations, and are necessary to protect specific resource values on the lease area:

(1) In order to protect crucial mule deer winter range, exploration, drilling and other development activity will be allowed only from April 16 to November 30 and not allowed from December 1 to April 15. This limitation does not apply to maintenance and operation of producing wells. This stipulation affects 64,353 acres.

Specific exceptions may be granted by BLM if the proposed activity will not seriously disturb wildlife habitat values being protected. This determination will be made by a BLM wildlife biologist in coordination with the UDWR and, if appropriate, the USFWS. Such a determination may result if unseasonably warm weather accounts for the lack of use of mule deer winter range. Therefore, the lack of mule deer present on the traditional winter range would allow for such disturbing activities for fluid mineral leasing and exploration.

(2) In order to protect crucial raptor nesting sites, exploration, drilling and other development activity within 0.5 mile radius of the sites will be allowed from July 16 to February 28, and not allowed from March 1 through July 15. This limitation does not apply to maintenance and operation of producing wells. This stipulation affects 79,300 acres.

Specific exceptions may be granted by the BLM if the proposed activity will not seriously disturb wildlife habitat values being protected. This determination will be made by a BLM wildlife biologist in coordination with the UDWR and, if appropriate, the USFWS. Such a determination may be made if raptor nest in question is not active at the time of proposed activity. Quite often raptors will have alternate nesting sites available. If a raptor pair is using such an alternative site, it would be necessary to protect the inactive nest from disturbing activities for fluid mineral leasing and exploration. However, it should be noted that all eagle nests, active or inactive, are protected by the Eagle Act and must be left intact and cannot be removed from their original location.

(3) In order to protect crucial sage grouse breeding complexes, exploration, drilling and other development activity within 0.5 mile radius of the complexes will be allowed from June 16 to March 14 and not allowed from March 15 through June 15. This limitation does not apply to maintenance and operation of producing wells. This stipulation affects 16,900 acres.

Specific exceptions may be granted by the BLM if the proposed activity will not seriously disturb wildlife habitat values being protected. This determination will be made by a BLM wildlife biologist in coordination with the UDWR and, if appropriate, the USFWS. Such a determination may result if the sage grouse complex has remained inactive over a period of years and it is determined by the BLM and DWR that the population no longer used the complex and no longer requires protection from disturbing activities for fluid mineral leasing and exploration.

(4) In order to protect visual resources in VRM Class II and III areas, activities in these areas will be located and designed in a way to meet Class II and III management criteria. This limitation does not apply to maintenance and operation of producing wells. If the lessee can demonstrate that operations can take place without impact to the resource being protected, an exemption to this stipulation may be granted, if approved in writing by the authorized officer in consultation with the District's VRM specialist. For Class II areas exemptions may be granted whereby changes due to the proposed action repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape. For Class III areas exemptions may be granted whereby changes due to the proposed action repeat the basic elements found in the predominant natural features of the characteristic landscape. This may be achieved through reclamation, topographic or vegetative screening, construction practices and use of non-reflective paints which blend into the viewscape for buildings, tanks, and pipelines.

(5) In order to protect riparian/wetland habitat and municipal and non-municipal watershed areas, no occupancy or other surface disturbance will be allowed within 1,200 feet of live water or within 1,200 feet of wetlands as defined by USFWS in "Classification of Wetlands and Deep Water Habitats of the United States," 1979, page 3. This limitation does not apply to maintenance and operation of producing wells. If the lessee can demonstrate that operations can take place without impact to the resource being protected, an exemption to this stipulation may be granted, if

TABLE 5
Fluid Mineral Leasing Categories

AREAS	Cat. 2 Reference Code*	Cat. 1	Cat. 2	Cat. 3	Cat. 4
Utah County					
Mule Deer Crucial Winter Range	1		2,320		
Elk Crucial Winter Range	2		5,860		
Sage Grouse Strutting Grounds (.5 mi.)	3		580		
Raptor Nest Sites (.5 mi.)	4		2,120		
VRM Class III	5		12,440		
Riparian/Wetland Habitat (1200 feet)	6		5,347	6,228	
Watershed				320	
Tooele County					
Mule Deer Crucial Winter Range	7		62,033		
Elk Crucial Winter Range	8		6,930		
Elk Calving	9		825		
Pronghorn Fawning	10		9,965		
Riparian/Wetland Areas (1200 feet)			44,288		
Sage Grouse Strutting Grounds (.5 mi.)	11		16,320		
Mule Deer Fawning	12		3,530		
Crucial Deer Summer Range	13		1,660		
Bald Eagle Roosts	14,15		15,188		
Raptor Nest Sites (.5 mi.)	16		77,180		
VRM Class II	17		8,720	32,863	
VRM Class III	5		130,837		
Deep Creek Mountains without Wilderness				28,260	
Stansbury Mountains without Wilderness				10,000	
Bonneville Salt Flats				30,203	
Simpson Springs Campground				2,173	
Wendover Vicinity				324	
Terra Vicinity				280	
Middle Canyon				112	
Ophir Canyon				124	
GRAND TOTALS		1,732,095	245,857	77,003	0

*Applies only to lands designated in Category 2

TABLE 5 (Continued)
Fluid Mineral Leasing Categories

REFERENCE CODES

(1) No activity from December 1 to April 15.
(2) No activity from November 1 to April 15.
(3) No activity within .5 mile from March 15 to June 30.
(4) No activity within .5 mile from February 1 to July 15.
(5) No degradation of scenic values.
(6) No activity within 1,200 feet of water.
(7) No activity from December 1 to April 30.
(8) No activity from December 1 to April 30.
(9) No activity from May 1 to June 30.
(10) No activity from May 1 to July 31.
(11) No activity from March 1 to April 30.
(12) No activity from May 16 to July 15.
(13) No activity from May 16 to October 31.
(14) No activity from November 1 to March 31.
(15) No activity from November 1 to March 31.
Oquirrh Mountains only - No occupancy on slopes greater than 30%.
(16) No activity February 1 to August 15.
(17) No degradation of scenic values.

approved in writing by the authorized officer in consultation with the District's watershed specialist. For example, exemptions may be allowed where the riparian zone or the hydrologic influence area of phreatophytes exists less than 1,200 feet from live water.

(6) In order to protect crucial antelope fawning areas, exploration, drilling and other development activity will be allowed only from July 2 to April 14 and not allowed from April 15 to July 1. This limitation does not apply to maintenance and operation of producing wells. Specific exceptions may be granted by the BLM if the proposed activity will not seriously disturb wildlife habitat values being protected. This determination will be made by a BLM wildlife biologist in coordination with the UDWR and, if appropriate, the USFWS. Such a determination may result if fawning is completed early and the fawning area is abandoned earlier to allow for disturbing activities for fluid mineral leasing and exploration to start earlier than July 1. This stipulation affects 9,965 acres.

(7) In order to protect crucial mule deer fawning areas, exploration, drilling and other development activity will be allowed only from August 1 to April 14 and not allowed from April 15 to July 31. This limitation does not apply to maintenance and operation of producing wells. Specific exceptions may be granted by the BLM if the proposed activity will not seriously disturb wildlife habitat values being protected. This determination will be made by a BLM wildlife biologist in coordination with the UDWR and, if appropriate, the USFS. Such a determination may result if fawning is completed early and the fawning area is abandoned earlier to allow for disturbing activities for fluid mineral leasing and exploration to start earlier than July 31. This stipulation affect 3,530 acres.

(8) In order to protect crucial elk calving areas, exploration, drilling and other development activity will be allowed only from July 1 to April 30 and not allowed from May 1 to June 30. This limitation does not apply to maintenance and operation of producing wells. Specific exceptions may be granted by the BLM if the proposed activity will not seriously disturb wildlife habitat values being protected. This determination will be made by a BLM wildlife biologist in coordination with the UDWR and, if appropriate, the USFWS. Such a determination may result if calving is completed early and the calving area is abandoned earlier to allow for disturbing activities for fluid mineral leasing and exploration to start earlier than June 30. This stipulation affects 825 acres.

(9) In order to protect crucial elk winter range, exploration, drilling and other development activity will be allowed only from May 1 to November 30 and not allowed from December 1 to April 30. This limitation does not apply to maintenance and operation of producing wells. Specific exceptions may be granted by the BLM if the proposed activity will not seriously disturb wildlife habitat values being protected. This determination will be made by a BLM wildlife biologist in coordination with the UDWR and, if appropriate, the USFWS. Such a determination may result if unseasonably warm weather accounts for the lack of use of elk winter range. Therefore, the lack of elk present on the traditional winter range would allow for such disturbing activities for fluid mineral leasing and exploration. This stipulation affects 12,790 acres.

(10) In order to protect bald eagle roost sites, exploration, drilling and other development activity within .5 mile radius of the sites will be allowed only from March 16 to November 14 and not allowed from November 15 to March 15. This limitation does not apply to maintenance and operation of producing wells. Specific exceptions may be granted by the BLM if the proposed activity will not seriously disturb wildlife habitat values being protected. This determination will be made by a BLM wildlife biologist in coordination with the UDWR and the USFWS. Such a determination may result if the roost site no longer exists or other roost sites are found to have taken over in importance to the bald eagles present to allow for disturbing activities for fluid mineral leasing and exploration. This stipulation affects 15,188 acres.

Due to the West Desert Pumping Project and Amax Corporation's evaporation ponds, major areas of public land will be subject to intermittent flooding. Therefore, all leasing of both solid and fluid minerals will be subject to these rights-of-way as delineated on the Master Title Plats. Lessees should be aware that exploration and development may include specific mitigation to protect the project's integrity. This mitigation could greatly increase the lessee's cost.

Rationale

To be consistent with the national energy policy, the Pony Express Resource Area has been categorized so that the Federal mineral estate in the area will be in the least restrictive category which would adequately protect the resources. Areas containing the most valuable, rare, and/or unique resource values were placed in more restrictive categories, where conflicts could be mitigated by using special stipulations and/or allowing no surface occupancy.

The acreages listed above for each category differs from those averages stated in the preferred alternative of the Draft RMP/EIS due to calculation errors. It further differs as the result of the change of 28,600 acres near the Bonneville Salt Flats from Category 3 (no surface occupancy) to Category 2 (open with special stipulations). VRM Class III can be adequately protected with a Category 2 fluid mineral designation.

Proposed Decision 3

The closure of 104,814 acres of Federal mineral estate within the Bonneville Salt Flat Recreation Area (see Figure 3) will continue until further studies clearly indicate that the closure could be modified without disrupting the natural hydrologic pattern of the entire basin north of I-80. Once definitive information is available, BLM will reevaluate the existing activities (including existing leases) on and adjacent to the Salt Flats, including recreation and minerals. Future activities to be allowed will be based on the results of that evaluation.

This closure affects further mineral leasing for potash, salts, and other similar brines. This closure does not affect *existing* leases, including Reilly's leases, so long as they remain in effect and all lease requirements are met.

Rationale

The purpose of this closure is to protect the Bonneville Salt Flats from possible damage that could result from extraction of brines. The closure will protect the area until sufficient scientific information is available to determine whether the closure area should remain the same, or be expanded, reduced, or eliminated.

Leases held by Reilly Tar and Chemical Company with the closure area are valid existing leases that are not affected by the closure.

Proposed Decision 4

Applications to remove other types of leasable minerals, such as phosphate, tar sands, and oil shale will continue to be processed on a case-by-case basis. Stipulations to protect important surface values will be required based on review of each proposal. Coal exploration and development, if any, would be regulated under 43 CFR 3400.

Rationale

This procedure has worked satisfactorily in the past and is appropriate for future actions. Development of these minerals has been minimal to date and known reserves of these minerals are small in the Pony Express Resource Area.

Proposed Decision 5

Approximately 89,840 acres would be withdrawn from locatable mineral entry for protection of the Knolls off-road vehicle area which is planned to be developed for recreation use. See Figure 3. As previously mentioned, BLM would continue to pursue mineral withdrawals for the Bonneville Salt Flats and Simpson Springs.

Rationale

The Knolls area possesses unique territorial character which complements the recreation and visual programs. Sand dunes are found throughout the area which provide excellent visual and recreational settings. The area is located along the I-80 travel corridor, which thousands of vehicles pass through yearly. Visual sensitivity is expected to grow higher in the future where the public will oppose adjacent visual intrusions. Currently the visual resource management class is IV which requires that management activities minimize the impacts through careful location, minimal disturbances and repetition of the basic elements. With visual sensitivity becomming more of an issue, VRM classification will be reevaluated at a higher (VRM III) level. Visual aesthetics are an issue to many user public and traveling tourists.

Health and safety of recreation users is one of the main objectives of BLM's recreation program. With the proposed delineation of the Knolls Special Recreation Management Area, safety is a primary concern for current and future uses. Off-road vehicles dominate the setting which offers excellent opportunities to recreationists. Withdrawing the area from mineral entry would help protect and perpetuate this recreational setting. This would minimize potential injury to users from surface disturbances or equipment.

The Simpson Springs recreation area is a developed recreation site with running water, camp units and vault toilets. The area supports a variety of recreational activities: camping, sightseeing, historical interpretation, off-road vehicle riding, hiking, hunting, exploring and scouting activities. Safety and visual qualities are primary objectives in the recreation program for this site. Mineral withdrawal would facilitate these objectives and complement quality recreational experiences of the user public. This withdrawal proposal stems from prior decisions in the Tooele County MFP (1984) and is proposed to be carried on through this RMP.

The Bonneville Salt Flats are a historical and unique geological phenomenon that support recreational and visual programs. The area has witnessed millions of visits over the past decade from traveling tourists. Years of high-speed automobile racing and commercial filming have also occurred. Protection of the fragile and diminishing salt crust (halite crystal) is essential to future protection of the salt. Mineral withdrawal of the 30,203 acre Special Recreation Management Area and Area of Critical Environmental Concern would strengthen current management objectives. This withdrawal proposal stems from prior decisions in the Tooele County MFP (1984) and is proposed to be carried on through this RMP.

Hazardous Waste Management

Proposed Decision 1

BLM will evaluate the known or unknown existing hazardous waste sites and take necessary actions as required by law. BLM will not authorize placement or processing of hazardous wastes on public lands. As unknown existing sites are identified and accidental or intentional dumping or spills occur, BLM will respond as required by law and pursue clean-up by the responsible party. Public health and safety and the environment will continue to be BLM's priority in this program.

Rationale

It is BLM policy that no further authorizations will be made for the treatment, storage or disposal of hazardous waste on public lands. Public lands may be made available for such uses but only after such lands are transferred from public ownership. This policy is supported by three Federal laws: Resource Conservation and Recovery Act as amended (RCRA), Comprehensive Environmental Response Compensation and Liability Act as amended (CERCLA) and the Superfund Amendments and Reauthorization Act (SARA).

Soil, Water, and Air Program

Proposed Decision 1

Soil, water, and air resources will continue to be evaluated on a case-by-case basis. Evaluations will consider the impacts of any proposed projects to soil, water, and air resources in the affected area. Stipulations will be attached as appropriate to ensure compatibility of projects with soil, water, and air resource management and compliance with applicable Federal and State soil, water or air implementation plans.

Soil will be managed to maintain productivity and tolerable erosion levels.

Water quality will be maintained or improved in accordance with State and Federal standards, including consultation with State agencies on proposed projects that may significantly affect water quality.

Rationale

The Clean Water Act, the Soil Conservation Act, and the Clean Air Act set objectives for these resources and give requirements to be met. BLM is required by law to comply with these acts.

Proposed Decision 2

BLM will acquire and protect water rights for use on public land and maintain them in cooperation with the State Water Engineer. Existing water rights will be evaluated to determine whether they are adequate in quantity and location to meet resource management requirements. Water rights records will be placed in a computer program for rapid access and update. Future resource management requirements may result in the need to change existing water rights and acquire additional water rights. Private water rights and water right applications on public lands will be evaluated to assure that necessary water is available for public use.

Rationale

Water rights are required by the State for any and all uses of water except for Public Water Reserve 107 waters. Generally, water demand exceeds supply and creates conflict between users. Water rights allow proper development and use of the water resource by water right holders.

Proposed Decision 3

BLM will monitor selected perennial streams for water quality trend to insure that management activities on public lands comply with existing State water quality standards. BLM management activities will be coordinated with the Utah State Water Engineer, the Utah Division of Environmental Health, and the U.S. Environmental Protection Agency for proper water management.

Rationale

Perennial streams are important water sources for wildlife, livestock, aquatic habitat, agricultural and domestic use. Water quality suitable to such uses needs to be maintained to ensure that these water sources continue to be available in the future. Executive Order 12088, Federal Compliance with Pollution Control Standards, dated October 24, 1978, directed that all Federal agencies comply with local standards and limitations relating to water quality.

Proposed Decision 4

Areas of erosion on public land will be identified and evaluated to meet the following objectives:

- Identify erosion source(s) on public land.
- Evaluate improvement potential and prioritize areas for improvement.
- Identify methods which will maintain or improve water and vegetative resources while providing for livestock and wildlife.
- Identify and implement management practices which will reduce or eliminate erosion that accelerates soil loss over that occurring naturally.
- Monitor vegetation and water conditions on the watershed.

Rationale

In several drainage areas that are generally within a slight to moderate erosion condition class, erosion could accelerate if preventative and corrective actions are not taken. BLM is mandated by numerous laws including FLPMA, the Clean Water Act, and the Soil Conservation Act (1935) to maintain or improve the overall watershed quality including the water and vegetative resources.

Proposed Decision 5

BLM will manage riparian areas, wetlands, and other water sources for multiple use purposes such as wildlife, range, watershed and recreation. These areas will be managed to meet the following objectives:

- Each area will be identified and classified for present condition.
- Management intensity levels will be determined and objectives developed for each area based on desired condition.
- The areas will be prioritized for funding and preparation of activity plans. These could include watershed, allotment, habitat and multiple resource management plans.
- Blm will seek cooperative efforts with adjoining landowners and other resource management agencies.

Rationale

Riparian areas are an important resource for many land use activities. As a consequence, riparian areas become highly controversial, requiring intensive management. BLM is mandated by Executive Order 11990 and manual requirements to manage these areas for multiple use while providing for protection and improvement of the areas.

Proposed Decision 6

Management actions within floodplains and wetlands will include measures to preserve, protect, and if necessary, restore their natural functions (as required by Executive Orders 11988 and 11990). Management techniques will be used to minimize the degradation of stream banks and the loss of riparian vegetation. Bridges, culverts, and fences and/or other necessary structures will be designed and installed to meet and maintain management objectives.

BLM will manage the portions of Rush Lake occurring on public land as a wetland over the long term.

Rationale

Executive Orders 11988 and 11990, Floodplain Management, require that floodplains and flood hazards be considered in all public land management. Appropriate management actions to reduce loss of life and property are required. Records verify that Rush Lake periodically fluctuates from being a sizable lake to being almost dry. Such fluctuations have occurred over a period as short as four years.

Proposed Decision 7

Air quality will be maintained or improved in accordance with State and Federal standards, including consultation with State agencies on proposed projects that may significantly affect air quality. Management actions on public land will be designed to protect against significant air quality deterioration.

Close coordination will be maintained with the State in the development or modification of air quality implementation plans to assure that BLM management options such as prescribed fire and smoke management are maintained. Coordination with the State will be continued on appropriate air quality classifications whenever BLM-managed areas of special concern (e.g. ACECs, wilderness study areas, and scenic areas) have been identified as significant features or characters.

Rationale

The Clean Air Act outlines the objectives and requirements that BLM must follow when managing public lands. This decision helps BLM meet these requirements.

Range Program

Proposed Decision 1

Total forage use by grazing users on public land in Tooele County will continue to be:

Cattle	39,173 AUMs
Sheep	67,001 AUMs
Domestic Horses	125 AUMs
Wild Horses	1,560 AUMs
Mule Deer	29,853 AUMs
Elk	470 AUMs
Antelope	1,518 AUMs
Bighorn Sheep	298 AUMs

This distribution of AUMs will continue until and unless reduced by disposal of lands as shown in Proposed Decision 1 under the Lands Program.

Rationale

These forage allocations are based upon the best data available for each allotment. They allow the maximum use within carrying capacity for each kind of livestock, wild horses, and affected wildlife species. These allocations, together with the appropriate seasons-of-use, activity plans, and range improvements, will help improve the overall condition of the vegetative resource.

Proposed Decision 2

BLM will prepare Allotment Management Plans (AMPs) for the remaining I category allotments in Tooele County as shown in Table 6 by 1991. AMPs for M allotments will not be completed until after 1991.

Rationale

Grazing use in allotments can be improved with development of plans including goals and objectives. The intensity and level of detail for the AMPs will vary depending on the nature of conflicts. Most funding for rangeland improvements will be spent on allotments with AMPs. Future levels of funding and manpower may require some adjustments in the priority list and schedule.

Proposed Decision 3

Categorize the twelve allotments in Utah County in the Custodial (C) category. Allotments in this management category have limited or no potential for improvement or return on investment. Present management is satisfactory or the most logical practice for the resource involved. Permittees will be encouraged to invest in rangeland improvement projects. The allotments will be

TABLE 6

ALLOTMENT MANAGEMENT PLAN PRIORITIES
For
CATEGORY I ALLOTMENTS

Priority	Allotments
1	Skunk Ridge - Completed 1984
2	Broad Canyon - 1986
3	South Clover - Completed 1985
4	West Ibapah - Transferred to Ely, NV
5	South Skull Valley - Completed 1985
6	Onaqui Mountain East - Completed 1985
7	Onaqui Mountain West - Completed 1985
8	Skull Valley - Completed 1985
9	Ophir - 1989
10	Ibapah - Completed 1985
11	Ochre - 1987
12	Government Creek - 1986 Draft
13	Saint John - 1988 Draft
14	Mercur Canyon/West Ophir - 1989
15	Hill Spring - Completed 1985
16	Overland Canyon - 1988
17	Clifton Flat - 1989
18	Indian Springs - 1987
19	Aragonite - 1988
20	North Cedar Mountain - 1990
21	North Puddle - 1990
22	Soldier Canyon - 1991
23	Rush Lake - 1989
24	Salt Mountain - 1986 Draft

monitored approximately once every 10 years to assure that resource deterioration is not occurring.

Rationale

The twelve allotments are placed in the C category for the following reasons:

- a lack of major conflicts,
- many of the allotments are in good to excellent condition and present management is satisfactory,
- potential for range improvements is very limited, and
- cost effectiveness of projects would be low due to small amounts of BLM land.

Proposed Decision 4

BLM will authorize livestock forage use as shown in Table 7 on six allotments. Grazing permits on six small, isolated allotments with minimal or no actual livestock use will be cancelled. These allotments are Iso-tract Cook, Iso-tract Ludlow, Iso-tract Willis, Cherry Creek, Scofield, and Genola Hill. Mule deer and elk use will continue at current levels as determined by BLM and UDWR. No seasons-of-use for livestock will be changed. Total forage distribution on public land in Utah County would be as follows:

Cattle	495 AUMs
Sheep	1,820 AUMs
Mule Deer	236 AUMs
Elk	14 AUMs
Moose	50 AUMs
Total	**2,615 AUMs**

Rationale

Approximately 78 percent of public lands grazed in Utah County are in either a late seral stage or are at the potential natural community. Use at the current allocation would maintain this condition on allotments where grazing will not be eliminated (also see Table 7).

The six allotments proposed to be eliminated are small and isolated with minimal to no actual livestock use. Elimination of these allotments will result in more effective management of the overall grazing program in Utah County because manpower and financial resources can be concentrated in more critical areas.

Wild Horse Program

Proposed Decision 1

BLM will continue to manage the herd size of the Cedar Mountain Wild Horse Unit at 85 animals (1,020 AUMs) and the Onaqui Mountain Unit at 45 animals (540 AUMs).

Rationale

Herd Unit Management Plans have been developed for these horse herds. This decision meets the objectives as outlined in the plans.

Wildlife and Fisheries Program

Proposed Decision 1

BLM will develop and implement Habitat Management Plans (HMPs) or other more specific wildife activity plans to protect, improve and maintain all important wildlife habitat. The HMPs will be prepared cooperatively with UDWR to assure that the State's wildlife management objectives are met.

All important public land habitat areas within the Pony Express Resource Area will be covered by such a plan. These areas are:

(1) ***Stansbury/Onaqui WHA.*** BLM will revise the existing Stansbury Mountain HMP to include all important public land habitat within the Stansbury and Onaqui Mountains. Interstate 80 and the Lookout Pass roads will form the north and south boundaries, respectively. The Skull Valley road will be the west boundary, and the Grantsville road and foothills of the Stansbury and Onaqui Mountains will be the east boundary.

(2) ***Horseshoe Springs WHA.*** This WHA will consist of the spring/riparian/mud flat area in northern Skull Valley between Interstate 80 and Iosepa. It will extend west from the Skull Valley road to the edge of the mud flat.

(3) ***Puddle Valley WHA.*** BLM will revise the existing Puddle Valley HMP to include all important public land habitat north of I-80 and between the Great Salt Lake on the east and the mud flats on the west.

(4) ***Simpson/Sheeprock WHA.*** This WHA will include Simpson, Sheeprock, Dugway and Davis Mountains and connecting valleys. Judd/Aspen, Indian and Sheeprock Creeks and riparian areas are also within this WHA. It is bound on the north and west by the military reservation, on the south by the Resource Area boundary, and on the east by the Vernon Division/Wasatch National Forest.

TABLE 7

FORAGE DISTRIBUTION BY ALLOTMENT

UTAH COUNTY

	Livestock Use (AUM's)			Big Game Use (AUM's)			
Allotment	Cattle	Sheep	Total	Deer	Elk	Moose	TOTAL
Cherry Creek			*	23	14	50	87
Scofield			*	1			1
West Mountain	178	710	888	103			103
Lake Mountain NE	--	445	445	29			29
Lake Mountain Davis	--	348	348	16			16
Lake Mountain Smith	--	41	41	19			19
Lake Mountain Monte Vista	317	--	317	25			25
Chipman	--	276	276	19			19
Iso-tract Willes			*				
Iso-tract Cook			*				
Iso-tract Ludlow			*				
Genola Hill			*				
TOTAL	495	1,820	2,315	236	14	50	300

GRAND TOTAL - 2,615 AUMs

*Part or all of these grazing allotments would be eliminated.

(5) ***Tintic R/A WHA.*** This WHA encompasses the East Tintic Mountains. The boundaries follow the Resource Area boundaries on the south and east, Twelve Mile Pass road on the north, and the Tintic foothills on the west.

(6) ***Gold Hill WHA.*** BLM will revise the existing Deep Creek Mountain HMP to include the former Gold Hill Planning Unit. It is bounded by the military reservation on the north and east and by the Resource Area boundary on the south and west. Rocky Canyon Creek/riparian area will also be contained within the WHA.

(7) ***Oquirrh Mountain WHA.*** This WHA will consist of the Oquirrh Mountains and foothills.

(8) ***Cedar Mountains WHA.*** This WHA will include the Cedar Mountains, the portion of Skull Valley not included in another WHA, and the valley west of the Cedar Mountains. The military reservation forms the west and south boundary, I-80 forms the north boundary, and Skull Valley road and the mud flats form the east boundary.

(9) ***Stansbury Island and Silver Island WHAs*** (tentative). HMPs may be written for these areas if important wildlife values are found.

HMPs will be done based upon the annual work plan and the area manager's decision. Only one possible HMP is anticipated in Utah County. Lands around Utah Lake presently withdrawn by the Bureau of Reclamation may be returned to BLM. An HMP covering some or all of these wetland-related lands may subsequently be prepared.

Rationale

It is BLM policy to develop comprehensive activity plans that state the management objectives and the steps necessary to accomplish these objectives for a given resource within a certain area. Once signed, the HMPs will guide the wildlife program within the area in an orderly and economic fashion.

Proposed Decision 2

BLM will continue to work cooperatively with UDWR to reintroduce bighorn sheep into the Deep Creek and Stansbury Mountains. To date 16 animals have been reintroduced to the Deep Creek Mountains. It is estimated that 85 animals could eventually inhabit public lands in the Tooele County portion of the Deep Creek Mountains, and 120 animals could eventually inhabit public and Forest Service lands in the Stansbury Mountains. At maximum population the bighorn sheep would require 298 AUMs annually. These reintroductions shall be implemented incrementally with monitoring until UDWR herd objectives are met or carrying capacity is reached, whichever occurs first. Additional specifics for implementation shall be developed through the HMP process.

Rationale

It is BLM policy to cooperate with State wildlife agencies where possible to reintroduce native species into historic ranges. There have been no conflicts with the bighorn sheep reintroduction effort to date and none are expected.

Proposed Decision 3

BLM will continue to monitor the reintroduced herd of antelope (150 animals) in southern Rush Valley, Tooele County, to determine if the herd conflicts with any other uses. If monitoring shows that major conflicts exist, close coordination with all affected parties will be undertaken to resolve the problems.

Rationale

Although no conflicts have been identified to date, BLM will continue to monitor the herd's interaction with other resources and uses.

Proposed Decision 4

BLM will agree to future reintroductions of big game species on the public lands within the Resource Area if the following criteria are met:

- BLM policy requirements as stated in manual 6820 must be followed.
- The species to be established must meet the definition of a reestablishment (reintroduction) as defined in manual section 6820.05c.
- The reintroduction must be approved or sponsored by the Utah Division of Wildlife Resources (UDWR).
- An Environmental Assessment (EA) and Habitat Management Plan (HMP) must determine:

(1) that the reintroduction will not negatively affect any native endangered, threatened or sensitive species, either plant or animal; (2) that land use conflicts which cannot or have not been resolved will not result from the reintroduction. In cases where the release may be for greater benefit than the competing use, the release may take precedence. Forage allocation for the proposed population will be based upon availability of forage not used by livestock due to the difference

in food preferences, and UDWR will seek agreement with adjoining landowners; and (3) what studies are necessary to monitor the reintroduction.

- Effective quarantine procedures must be implemented to insure that the release stock is disease-free.

Following the completion of the HMP, a Cooperative Agreement between BLM and UDWR must be prepared to authorize the big game reintroduction.

The above procedure applies only to big game species. Federally-threatened, endangered, and sensitive species will be subject to similar procedures but will be handled on a case-by-case basis. Fisheries and upland game species are not affected by this decision but must meet the criteria outlined in the Master Memorandum of Understanding (MOU) between UDWR and the BLM.

The recent introduction of Rocky Mountain elk onto the Goshute Indian Reservation was not coordinated through BLM. No forage has been allocated in the Deep Creek Mountains for elk; however, it is likely that these animals will summer and potentially become established on BLM lands. Conflicts could arise between livestock, bighorn sheep, and elk. Conflict resolution will be coordinated through all affected parties.

Rationale

It is BLM policy to cooperate with State wildlife agencies, where possible, to reintroduce native species into historic ranges. The Master MOU between the BLM and UDWR also calls for this cooperation. The above criteria meet the Master MOU and BLM manual requirements for the reintroduction of big game species.

No BLM lands were included in the elk transplant area. The elk herd will be observed in the coming years to see if they utilize public lands and if a trend develops. If conflicts arise, a planning amendment will be required to determine if changes in forage allocation are needed and/or desired.

Proposed Decision 5

BLM will continue to encourage UDWR's proposed reintroduction/transplants of upland game birds (chukar partridge, sage grouse, sharp-tailed grouse, ring-necked pheasants, etc.) onto suitable habitat within the Resource Area. Specifics for implementing any such proposed reintroduction/transplants shall be developed in the HMP for the habitat area.

Rationale

It is BLM policy to cooperate with State wildlife agencies, where possible, to reintroduce/transplant desirable upland game birds with the Resource Area so long as such reintroductions are compatible with other resource needs. The Master MOU between BLM and UDWR also calls for cooperation between the agencies.

Proposed Decision 6

BLM proposes to cooperate fully with peregrine falcon reintroductions into the Timpie Springs and Blue Lake areas. Surface disturbing activities on public lands adjacent to these reintroduction sites will not be permitted to disturb birds or destroy important habitat. BLM will develop specifics for further management actions in the HMP for the habitat area.

Rationale

It is BLM policy to cooperate with State wildlife agencies, where possible, to reintroduce native species into historic ranges. The Endangered Species Act prohibits Federal agencies from taking any action that is likely to jeopardize the continued existence of the Federally endangered peregrine falcon. The act further requires Federal agencies to carry out programs to conserve threatened and endangered species and restore the species to a non-endangered status.

Proposed Decision 7

BLM will protect important wildlife habitat values from disturbing activities by restricting seismic work, well development, new road construction, rights-of-way, organized recreational activities, military exercises, and other disturbing activities excluding maintenance activities in the following areas during the stated time periods:

(1) within mule deer winter range December 1 to April 15.

(2) within 0.5 mile of active raptor nest sites March l to July 15.

(3) within 0.5 mile of sage grouse strutting grounds (leks) and crucial sage grouse nesting habitat between February 15 and June 15 each year and within winter crucial habitat areas December 1 through March 1.

(4) within 1200 feet of riparian habitats.

(5) within bighorn sheep crucial winter and lambing areas. Once these ranges have been established by the reintroduced animals, appropriate dates and crucial habitats will be delineated.

(6) within antelope fawning areas April 15 to July 1.

(7) within crucial mule deer summer/fawning habitats April 15 to July 31.

(8) within crucial elk winter range December 1 to April 30 and calving areas May 1 to June 30.

(9) within waterfowl habitat, i.e. marsh and wetland areas.

(10) within .5 mile of bald eagle roost sites between November 15 and March 15.

Specific exceptions may be granted by BLM if the proposed activity will not seriously disturb the wildlife habitat values being protected.

Rationale

Implementation of the above measures will provide necessary protection of key wildlife habitats in the Resource Area. These measures will provide adequate protection for important breeding, wintering, watering, and feeding habitats for a variety of wildlife species, as well as preventing unnecessary degradation of the environment.

These measures also comply with mandates as outlined in Executive Orders 11988 and 11990, Federal Water Pollution Control Act, and FLPMA (Section 103).

Proposed Decision 8

BLM will improve, maintain and expand those areas suitable for waterfowl and shorebird habitat. Measures could include (1) implementation of appropriate marsh and wetland maintenance and protection through grazing systems, use restrictions, and fencing if appropriate; (2) expansion through appropriate land and water right acquisitions, habitat management plan development and implementation; (3) waterfowl improvement through construction of new reservoirs and modification of suitable range or watershed reservoir projects, vegetation plantings, protected nesting area construction; and (4) open water and loafing area construction through such measures as pothole blasting and dike construction.

Rationale

Improving habitats for waterfowl and shorebirds also improves watershed condition, water quality, increases recreation opportunities, and improves vegetation condition in general. The habitat improvement activities are consistent with BLM's multiple use management policy.

Proposed Decision 9

BLM will use cooperative management plans to provide an opportunity for wildlife habitat development and improvement. Habitat could be expanded on public lands by converting isolated tracts of rangeland within pheasant range to cropland or irrigated pasture. Cooperative agreements between BLM, UDWR and a lessee who farms the land work effectively. Under such an agreement, the lessee would employ farming practices which provide pheasant habitat and allow public hunting in exchange for farm production values received on the harvested portion. Only areas with suitable soil and adequate water near existing agricultural areas should be considered.

Rationale

Cooperative management plans for wildlife habitat have worked well for the Salt Lake District in the past. These types of agreements benefit wildlife, the public and the private landowner with little or no conflict or controversy.

Proposed Decision 10

All threatened and endangered species are provided for under the Endangered Species Act; however, due to the unusual resource that exists within the Resource Area, additional measures will be made to improve and encourage the propagation of these important species. These measures include:

- maintenance and improvement of bald eagle roosting and winter high uses areas, installation of natural and artificial roosts to replace dead trees, maintenance of prey base habitat, i.e. jackrabbit populations.
- protection and improvement of peregrine falcon historic eyres and habitat.

BLM will also protect candidate species during critical nesting periods. These species include ferruginous hawks and swainson's hawks.

Rationale

The Endangered Species Act prohibits Federal agencies from taking action that is likely to jeopardize the continued existence of any threatened or endangered species or to adversely modify critical habitat. The act further requires Federal agencies to carry out programs to conserve threatened and endangered species and to restore such species to a non-endangered status. The above decision is in compliance with these regulations.

Proposed Decision 11

Rangeland watering facilities will allow for wildlife use. When possible, overflow ponds at water developments will be at least 100 yards from livestock watering sources to allow for a cleaner water source for wildlife. Location of future water developments should minimize conflicts between livestock and wildlife.

All livestock fencing projects will allow for movement of wildlife. Design and specifications will be dictated by terrain, kind of livestock and species to be managed.

Rationale

It is BLM policy to facilitate wildlife use when designing and building improvements.

Proposed Decision 12

BLM will improve crucial habitats of present wildlife populations where condition and trend indicate a decline of desirable plant communities. An appropriate wildlife habitat study will be conducted to determine the condition of these areas. This information will help guide BLM in planning improvement projects. Some of the crucial habitats that warrant further study include:

(1) crucial mule deer winter range,

(2) crucial mule deer summer/fawning range,

(3) sage grouse crucial strutting and associated nesting habitat,

(4) sage grouse crucial winter range,

(5) antelope fawning areas, and

(6) bighorn sheep ranges.

On these ranges, grazing use will be reviewed for opportunities to reduce conflicts between livestock and wildlife, e.g., domestic and bighorn sheep would be incompatible as disease transmission potential is high. Change of livestock kind could help improve riparian areas when coupled with other measures.

Vegetation treatments such as burning, chaining, reseeding and all other manipulations within crucial ranges of wildlife species will be designed to maintain habitat for those wildlife species most threatened by the practice.

Rationale

Crucial habitats are the limiting factor in the maintenance of most wildlife species. It is important to the species' survival that these habitats remain or are improved to be in good condition. When wildlife crucial habitats are improved, other multiple use resource values may also be improved. Habitat improvements can improve watershed condition by decreasing erosion. Stream condition can be improved by improving riparian habitat condition. These improvements increase potential recreation use.

Recreation Program

Proposed Decision 1

Manage the following areas as Special Recreation Management Areas (RMAs):

(1) ***Bonneville Salt Flats Special RMA***, 30,203 acres

(2) ***Pony Express Route Special RMA***, 21,120 acres.

(3) ***North Deep Creek Special RMA***, 24,960 acres.

(4) ***Payson Motocross Track Special RMA***, 100 acres.

(5) Knolls Special RMA, 37,760 acres.

These areas are shown in Figure 6. The remainder of the Pony Express Resource Area would be managed as an Extensive Recreation Management Area (ERMA).

Rationale

The purpose of RMAs is to establish a basis for determining priority for management and funding, and to delineate units that will require activity planning. The above SRMAs are all areas where a commitment has been made, within the parameters of multiple use, to provide specific recreation activity and experience opportunities on a sustained yield basis. These areas require a higher level of recreation investment and/or management than the ERMA requires. The ERMA possesses several other management objectives outside of recreational use. This extensive area provides unstructured types of recreational activities.

Proposed Decision 2

Designate all public land in the Resource Area as either open, closed, or limited for off-road vehicle use as follows:

	Acres
Open to ORV use	1,669,267
Limited for ORV use	363,439
Closed to ORV use	0

Also see Table 8 and Figure 7 for specific resource values and areas designated.

TABLE 8

Off-Road Vehicle Designations

AREAS	Open	Limited (Acres)	Closed
Utah County			
Mule Deer Crucial Winter Range		280[1]	
Elk Crucial Winter Range		1,920[1]	
Sage Grouse Strutting Grounds (.5 mi. radius)		340[1]	
Riparian/Wetland (1200 feet)		1,447[3]	
Tooele County			
Mule Deer Crucial Winter Range		45,747[5]	
Mule Deer Fawning		1,070[1]	
Riparian Wetland Areas		43,408[6]	
Bald Eagle Roosts		13,575[1]	
Sage Grouse Strutting Grounds (.5 mi.)		10,314[1]	
Antelope Habitat (Puddle Valley)		192,854[7]	
Elk Calving		652[4]	
Critical Watershed		34,904[4]	
Simpson Springs Campground		40[4]	
No. Deep Creek Mountains		28,260[8]	
Stansbury Mountains		10,000[2]	
Antelope Fawning		9,755[1]	
Mule Deer Crucial Summer Range		1,540[1]	
GRAND TOTALS	1,669,267	363,439	0

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[1] Seasonal limitation for organized, permitted ORV events.
[2] Seasonal limitation for all ORV activity.
[3] No organized, permitted ORV events within 1,200 feet.
[4] Limited to existing roads and trails.
[5] Stansbury Mountains: Limited to existing roads and trails seasonally.
Onaqui Mountains: Limited to existing roads and trails yearlong. Closed seasonally to organized permitted events in Deep Creek Mountains.
[6] Rush Lake and Horseshoe Springs: Closed seasonally.
No activity within 1,200 feet of other riparian areas.
[7] Closed to organized, permitted events year-round.
[8] Limited to designated roads and trails.

Rationale

ORV designations are intended to protect the resources of the public lands, to provide the safety of all users of those land, and to minimize conflicts among the various uses of those lands. Limiting ORVs establishes controls to govern the use and operation of off-road vehicles in riparian/wetland areas, crucial wildlife habitats, developed recreation sites, watersheds, scenic areas, or areas of potential safety hazards.

Visual Resource Management

Proposed Decision 1

Designate visual resource management (VRM) classes within the Resource Area as follows (also see Figure 8):

Class I	0 acres
Class II	70,520 acres
Class III	133,600 acres
Class IV	1,827,126 acres
Rehabilitation Areas	1,460 acres

Rationale

The VRM classes provide managers with objectives that can be applied to actions taking place on the public lands. Land use proposals are reviewed to determine whether visual impacts can be adequately mitigated to meet the objectives of the VRM classes.

Cultural Resource Program

Proposed Decision 1

Cultural resources (which include historic and prehistoric sites, artifacts, structures or locales) will continue to be inventoried and evaluated on a case-by-case basis. Such evaluation will consider the impacts of any proposed project to cultural resources in the affected area. Stipulations will be attached as appropriate to assure compatibility of projects with management objectives for cultural resources.

For existing cultural properties, a determination of significance will be made prior to any project being implemented (this may include re-recordation and/or testing of a site). In project areas where resource knowledge is limited or unknown, both examinations of existing data and field inventories will be done to identify the resources and evaluate the significance of each (whether they meet the criteria of eligibility of the National Historic Prservation Act for nomination to the National Register of Historic Places). In all cases, new sites will be recorded using Intermountain Antiquities Computer System (IMACs) forms, and include maps and photo documentation.

Prior to the implementation of any activity plan or project that may adversely affect any cultural resources, the Utah State Historic Preservation Office (SHPO), and if necessary, the Advisory Council on Historic Preservation (ACHP), will be consulted in the determination of effect upon the property. Appropriate mitigation measures would be undertaken for any sites determined to be adversely affected by the proposed project or plan. These measures may include, but are not limited to, the following:

(1) Adjusting of the project boundaries to avoid impacting the sites.

(2) Adopting methods or techniques that would minimize disturbance to the site and its environmental setting.

(3) Additional testing and evaluation of the site.

(4) Removing and relocating the cultural property to another appropriate location after documentation of the property and the development of a management plan to maintain the historic value of the property.

(5) Excavating archeological properties with a goal of recovering the research values of the properties.

The inventory or mitigation will be directed by BLM cultural resource specialists or through contracts with individuals or institutions meeting professional standards.

Rationale

Federal law requires that we consider the effect of all BLM proposed, funded or licensed undertakings upon cultural resources. Regulation and policy have been developed to guide such activities.

Proposed Decision 2

As time and funding allow, BLM will evaluate all recorded sites on public lands within the Resource Area and assign them to one of three management categories, indicating availability for:

(1) immediate scientific research,

(2) recreation use/interpretation, or

(3) conservation for future use.

Rationale

BLM has developed management categories to enable the manager to better manage cultural resource properties. As cultural resource properties are identified and evaluated, current BLM policy requires that they be assigned to a category.

Proposed Decision 3

A monitoring plan will be developed for the Resource Area. This plan will present a systematic scheme for examining significant sites over time to determine the causal agent and whether there is any deterioration of the sites. Steps may then be taken to protect the sites being damaged.

All sites newly recorded on public lands within the Resource Area will be evaluated and assigned to one of the three management categories listed above. If warranted, they will also be included on the list of sites covered by the monitoring plan.

Rationale

Federal laws, regulation and policy require that we protect significant cultural resources (i.e. those which are eligible or potentially eligible for inclusion on the National Register of Historic Places). A monitoring plan will provide BLM with a systematic method of checking on those significant sites in the Resource Area which require protection. BLM will then monitor any deterioration (whether human or natural causes) and develop methods to counter or halt such deterioration.

Proposed Decision 4

Following completion and management acceptance of the BLM study of predictive modeling in archaeological survey work, a predictive model of archaeological site locations shall be developed to provide the basis for the protection of cultural resources in the Pony Express Resource Area. The goal of the model is to identify and evaluate those natural environmental and physiographic variables by which the probability of archaeological site occurrence and density can be predicted.

If the probability for the occurrence of archaeological sites is predicted to be low for a particular area, an archaeological clearance may be granted based upon inventories done in the past. At least 25 percent of all projects in these areas will have some survey to test and refine the predictive model.

If the model predicts a high probability of finding sites within an area, a cultural resource clearance shall be made for all surface disturbing actions on public lands using standard BLM procedures.

The model will be examined at least once every two years for validity and refinement. New data will be added and assessed at that time.

Rationale

As the public lands managed by the Salt Lake District are quite extensive, it is extremely difficult to comply with existing laws and regulations to identify and protect significant cultural resources. A predictive model would provide a statistically valid method for aiding in the determination of which areas would require cultural inventory prior to project development.

Proposed Decision 5

Efforts will be undertaken on a regular and systematic basis to educate the public on the values of preserving their historic and prehistoric heritage. These efforts will include informing the public of archaelogical data collection needs and methods and the Federal laws which protect cultural resources. These efforts will include, but not be limited to, working with the public schools to enhance their curriculum, providing training to local school teachers, providing training to members of the Utah State-wide Archaeological Society (USAS), and working with students and faculty from interested colleges and universities.

Rationale

Vandalism and inadvertent destruction of cultural resources on public lands is a growing problem in Utah and the entire western United States. Education seems to be the best method to decrease site damage. As people acquire knowledge of the values of archeological resources, they acquire a sense of ownership of the resource which results in a desire to protect it. Those who wish to profit from such vandalism may be deterred by knowledge of the laws which protect the sites. Over 80 percent of Utah's population is within the Salt Lake District. Through our educational efforts, BLM is in a position to have a positive effect upon cultural resource protection throughout the state.

Proposed Decision 6

A sensitivity map will be developed for the Resource Area which will depict the geological formations and areas with known potential to contain important paleontological resources. Should a proposed surface-disturbing project be within an area of high sensitivity for palentological resources, the State paleontologist will be consulted prior to the issuance of a decision.

Rationale

The State of Utah has a wealth of significant paleontological resources. This map would allow resource specialist to better consider potential impacts.

Areas of Critical Environmental Concern

Proposed Decision 1

Approximately 30,203 acres of the Bonneville Salt Flats in Tooele County will continue to be managed as an ACEC. The following areas also would be designated as ACECs:

Horseshoe Springs(760 acres)

North Stansbury Mountains(10,000 acres).

This area would be designated as an ACEC only if Congress does not designate the area for wilderness.

North Deep Creek Mountains(28,260 acres).. This area would be designated as an ACEC only if Congress does not designate the area for wilderness.

Figure 5 shows the proposed ACECs and the Bonneville Salt Flats ACEC. Table 9 shows the management prescriptions for each area.

Rationale

The Deep Creek Mountains are a unique "island ecosystem" within the Basin and Range Province. The special worth of these mountains rests on many outstanding features, including scenic, recreation, watershed, bristlecone pine, cultural/historical values, and bighorn sheep. These mountains are being evaluated for possible inclusion in the National Wilderness System.

The unique character of the Deep Creek Mountains compared to all others in the PERA makes them of regional importance. The extensive number of sensitive resources present satisfy the relevance criterion and justify the need for special management to protect against irreparable damage. If the Deep Creek Mountains are not designated as wilderness, BLM feels that the area has sufficiently important quality to be recommended for ACEC designation.

The unique saline plains of the Bonneville Salt Flats (BSF) have been intensively managed for the past few decades for high speed automobile testing and racing. A Recreation Area Management Plan was completed in 1977 and revised in 1985. In 1985, 30,203 acres of the BSF were also designated as an ACEC to perpetuate and protect the values and resources of the area. Objectives of the plan are to (a) preserve the unique visual, historic and geological resources, (b) minimize and manage mineral uses and other surface disturbing activities to avoid resource damage, (c) coordinate management of the BSF ACEC with other landowners and (d) recognize and manage racing and filming activities on the Salt Flats.

The BSF contain three "relevant" resources.

The salt's potential for land speed racing was recognized in 1896 and has become known as the "world's fastest mile." Thousands of records have been set there.

Unique vistas are offered by the contrast between the white salt flats and a distant blue horizon broken only by various mountains. The BSF are rated as a Class A Scenic Quality Unit. The VRM resources were designated Class II.

The BSF are a unique area, directed by geophysical processes that are highly sensitive to interruption by human activity. The area is estimated to have once covered 96,000 acres of crystalline salt, but presently covers about 30,000 acres.

Because of their sensitivity and unique character, the BSF are a nationally and internationally significant resource and meet importance and relevance criteria for an ACEC.

The southern part of the Stansbury Mountains has been designated as a U.S Forest Service wilderness area (Deseret Peak Wilderness). The northern portion, comprised of 10,480 acres of contiguous public land, is being evaluated for possible wilderness designation. The main values found in the range are remoteness, watershed, varied topography, scenic quality, geologic values, and vegetative diversity.

If the northern portion of the Stansbury Mountains is not designated as wilderness, BLM feels that the area has sufficiently important qualities to be recommended for ACEC designation.

Horseshoe Springs is located in the north end of Skull Valley about seven miles south of U.S. Interstate 80. The springs are comprised of several interconnected ponds and channeled streams that cumulatively provide several acres of water area and adjacent wetland habitat.

The Horseshoe Springs area has potential for ACEC management to recognize and protect unique springs and wetlands. The Horseshoe Springs wetland complex covers a significant amount of acreage and is unique to an otherwise dry region. The springs are warm enough to remain open throughout the winter months. This makes the springs complex very valuable as a winter water source. The area is a popular recreation site for off-road vehicle use, birdwatching, hunting, fishing, and camping. The springs and wetland complex area are a concentrated nesting

TABLE 9
MANAGEMENT PRESCRIPTION
FOR
AREAS OF CRITICAL ENVIRONMENTAL CONCERN

	NORTH DEEP CREEK MOUNTAINS	NORTH STANSBURY MOUNTAINS	HORSESHOE SPRINGS
Lands	Unavailable for ownership adjustments. Evaluation for possible withdrawal action.	Unavailable for ownership adjustments.	Unavailable for ownership adjustment.
Minerals	Fluid mineral leasing category 3. (No surface occupancy)	Same as North Deep Creek Mountains.	Fluid mineral leasing Category 2. (Special stipulations)
Soil, Water, Air	Soil managed to maintain productivity and tolerable erosion levels. Water quality will be maintained or improved. Manage riparian, wetlands and other water sources for multiple purpose uses. Air quality maintained or improved, coordination with State on air quality, classification for special concerns such as an ACEC.	Same as North Deep Creek Mountains.	Same as Deep Creek Mountains. Manage wetlands for multiple-use. Intensive management of riparian habitat. Preserve and protect wetlands. Water right acquisition.
Range	Continue grazing at active preference levels on Ibapah, Overland Canyon, and Sixmile Allotments.	Continue grazing at active preference levels on Stansbury Mountain, Stansbury Broad Canyon, Lone Rock, Timpe NW Grantsville, Salt Mountain Allotments.	Wetland protection through grazing systems use restrictions and fencing if appropriate.

TABLE 9 (Continued)
MANAGEMENT PRESCRIPTION FOR AREAS OF CRITICAL ENVIRONMENTAL CONCERN

	NORTH DEEP CREEK MOUNTAINS	NORTH STANSBURY MOUNTAINS	HORSESHOE SPRINGS
Wildlife & Fisheries	Continue to cooperate with UDWR to reintroduce bighorn sheep. Continue to provide forage for bighorn sheep and mule deer. Improve crucial habitats for wildlife. Seasonal closures for crucial habitats.	Cooperate with UDWR to reintroduce bighorn sheep. Improve crucial habitats for wildlife. Seasonal closures for crucial habitats. Revise/expand present HMP.	Seasonal closures for crucial habitats. Prepare HMP. Protect historical range for peregrine falcon reintroduction. Improve, maintain, and expand those areas suitable for waterfowl and shorebird habitat.
Recreation	North Deep Creek Special Management Areas. Limited off-road vehicle designation.	Limited off-road vehicle designation.	Limited off-road designations. No organized recreational activities within waterfowl habitat.
Visual Resources	Surrounding foothills Class III. Mountain area Class II.	Surrounding foothills Class III. Mountain ridgetop areas Class II.	Class IV
Forestry	No harvest of saw timber or pinyon pine except for management purposes.	No harvest of saw timber or pinyon pine except for management purposes.	N/A
Transportation & Utility Corridors	Avoidance area for VRM Class II and Class III. Slopes greater than 30%. Rights-of-way on ridge tops and narrow drainages.	Same as North Deep Creek Mountains.	Not within 1,200 feet of riparian habitat. Not within waterfowl habitat.

and feeding area for ducks and other species of birds. The area is a historic use area for the endangered peregrine falcon and with reintroduction likely would be used again.

The importance and sensitivity of the spring complex warrant ACEC designation.

Forestry Program

Proposed Decision 1

No harvest of saw timber for commercial or individual use shall not be allowed anywhere on public land within the Pony Express Resource Area except for maintenance practices such as thinning, disease control, wildlife improvements, and watershed enhancement.

The harvest of pinyon pine for use as Christmas trees, either commercially or individually, shall be at the discretion of the Authorized Officer. These stands will be managed as outlined in the Utah Supplemental Guidance: Management of Woodland Resources.

No wood products of any kind may be harvested from public land within the areas recommended for designation as wilderness. This decision will not prohibit thinning of trees for management purposes, i.e., habitat improvement, watershed, or riparian zone protection, as approved by the State Director on a case-by-case basis.

Harvest of firewood, fence posts and Christmas trees shall not be authorized in crucial deer winter range during the period of December 1 to April 30.

All other areas of juniper forest on public land within the Pony Express Resource Area shall remain open to harvesting of firewood, fence posts, Christmas trees or any other juniper products as defined in the Tooele County Woodland Management Plan and the Utah Supplemental Guidance: Management of Woodland Resources.

Rationale

Limited amounts and inaccessibility of saw timber in the Resource Area make it uneconomical for commercial or individual harvest. The use of pinyon pine for Christmas trees must be limited in order to manage the small areas of pinyon pine for continued productivity in the Resource Area.

It is BLM policy that no woodland harvests occur in WSAs.

In order to protect deer during the crucial wintering period, some areas will be closed to woodland products harvest.

The majority of the Resource Area is open to woodland products harvest as outlined in the Tooele County Woodland Management Plan.

Transportation and Utility Corridors

Proposed Decision 1

Transportation and Utility corridors over public land are not designated under FLPMA Section 503 because land ownership patterns make corridor designations impractical. Future proposals for major rights-of-way such as pipelines, large powerlines and permanent improved roads will, to the extent practical, utilize identified corridors and rights-of-way as shown in Figure 10. Otherwise, a planning amendment and appropriate environmental analysis will be required. Proposals that are not considered major may be sited outside existing corridors and rights-of-way after demonstrating that locating within a corridor or right-of-way is not viable. In all cases, the utilization of rights-of-way in common shall be considered whenever possible. Rights-of-way, whether within or outside a corridor, will avoid the following areas to the maximum extent possible:

(1) lands within 0.5 mile of sage grouse strutting grounds if the disturbance would adversely impact the effectiveness of the lek.

(2) lands within 1200 feet of riparian/aquatic habitats.

(3) lands within VRM Class II and III areas.

(4) lands within WSAs.

(5) lands where an above-ground right-of-way would be an obvious visual or physical intrusion such as ridge tops or narrow drainages.

(6) lands with slopes greater than 30 percent.

(7) lands with known or suspected hazardous materials.

In addition, construction activities would not be allowed within the crucial seasons and habitats for mule deer, elk, pronghorn, bald eagles, and other raptors.

Exceptions may be permitted based on consideration of the following criteria:

- type and need for facility proposed and economic impact of facility,
- conflicts with other resource values and uses, and
- availability of alternative routes and/or mitigation measures.

Rationale

Section 503 of the Federal Land Policy and Management Act of 1976 states,
"In order to minimize adverse environmental impacts and the proliferation of separate rights-of-way, the utilization of rights-of-way in common shall be required to the extent practical..." BLM's intention is to make every reasonable effort when considering right-of-way proposals to avoid environmentally sensitive areas and to meet the needs of the local populace and other users.

Fire Management

Proposed Decision 1

All wildfires on public land will receive some level of suppression. The authorized officer has the responsibility to determine the intensity of the suppression effort to meet the overall protection objective to put the fire out with minimum suppression cost and minimal losses, consistent with management objectives.

All facilities, structures or developments that are susceptible to fire damage will receive intensive suppression. The primary objective with this level of suppression is to prevent loss of life, property, or unacceptable resource damage. All other public lands in the Resource Area will be considered conditional suppression. On these lands the intensity of suppression actions is not fixed and will vary with the conditions occurring at the time of start. These conditional suppression areas will be managed on a least cost plus resource loss basis. In these areas, the full spectrum of intensities is to be considered and the determination on which intensity level to initiate suppression is based on the conditions at the time.

Objectives for fire management are planned results which can more than likely be attained and are categorized by vegetation type. Many factors influence these objectives including vegetation (fuel) type, rate of spread, travel distance involved with initial attack, historic fire occurrence, fire weather, and availability of fire suppression resources to name just a few. There are other opportunities to lessen the acres burned, but budget restraints have limited their implementation. They include green stripping, blacklining, additional engines at all field stations, and the construction of an additional field station in southern Skull Valley. BLM will prepare vegetation modification plans for Skull Valley and Puddle Valley to reduce wildfire and attempt to stop or reverse the cheatgrass conversion cycle. BLM can, however expect some fire occurrence in the Resource Area and, due to current field station location and mix of equipment, anticipate some loss of vegetation. If the acres identified in the objectives are exceeded and resource damage occurs, the above mentioned methods to lessen acres burned may be implemented.

The following objectives are tied to vegetation types per fire occurrence and are common for all periods of the year:

(1) In the desert shrub/saltbush vegetation type confine fires to 100 acres.

(2) In the sagebrush/perennial grass vegetation type, including areas of juniper invasion, confine fires to 300 acres.

(3) In the juniper vegetation type, confine fires to 200 acres.

(4) In the annual vegetation type, confine fires to 300 acres.

(5) Under burning conditions which would threaten to sterilize soil, confine all fires in all vegetation types to 50 acres.

(6) Where threatened and endangered plants are present, design wildfire control measures to protect the species.

Five additional vegetation types are not covered by these objectives. Fire occurrence within these types has been minimal and should be evaluated on an individual basis by the resource advisor. Objective 5 would still apply to these vegetation types.

Prescribed fire will be used as a resource management tool. Figure 11 indicates the fire management and use areas in Tooele County. Prescribed burns within the areas will be used to alter vegetation for the benefit of watershed, livetock grazing and/or wildlife habitat. The areas selected for prescribed burning will have the potential for natural revegetation.

Rationale

BLM policy requires a fire management program that identifies conditional suppression areas and provides thresholds for allowable burned acreages for various vegetation types.

Costs of Implementation

The costs of implementing the proposed RMP would generally approximate the current operating budget of about $500,000 per year. There would, however, be some increased costs associated with implementation and management of the plan. Additional costs from more intensive management of some programs would occur in the following areas:

(1) Administrative costs of ACECs and special recreation management areas.

(2) Allotment Management Plan (AMP) development, and on-the-ground management.

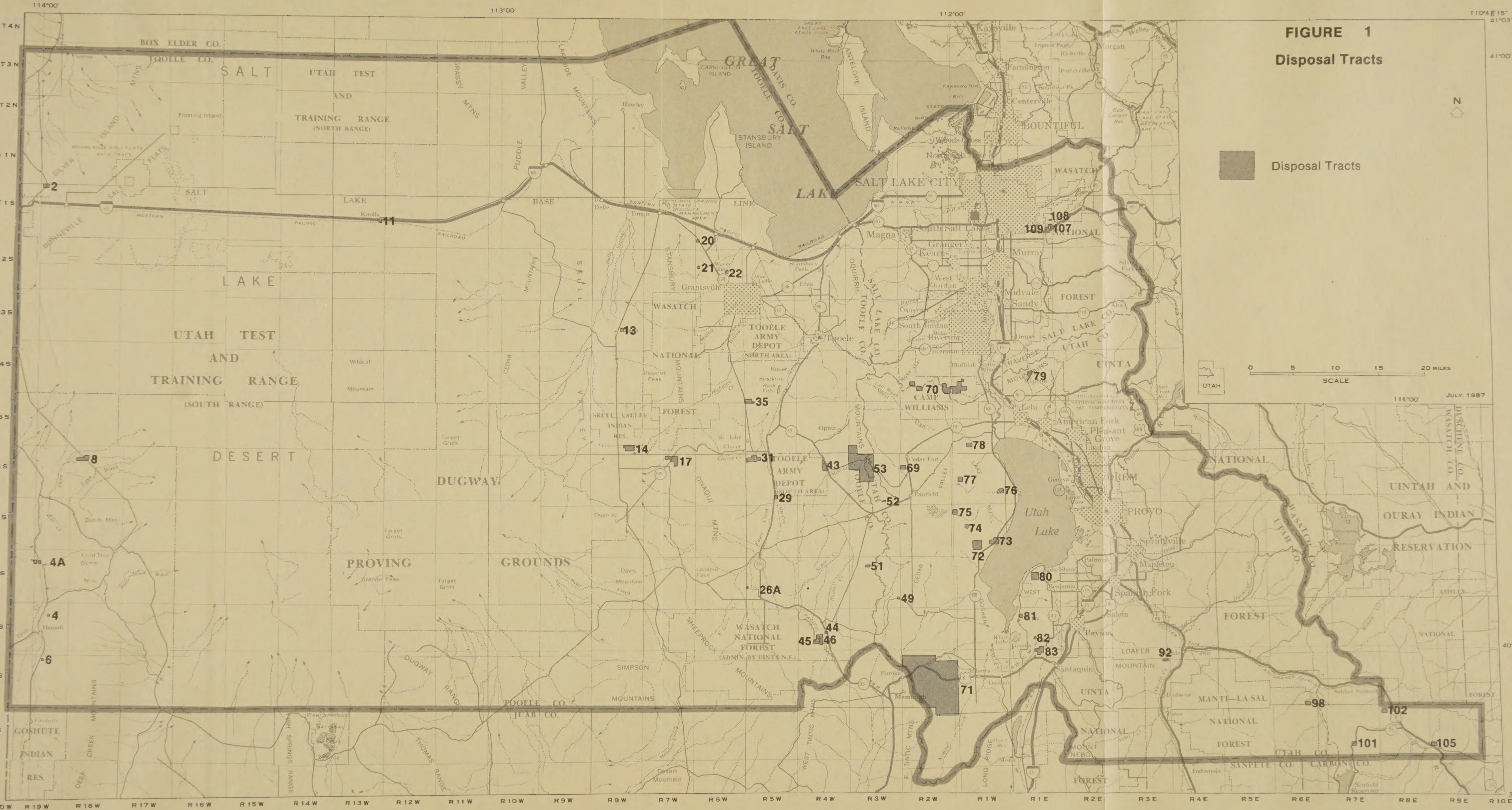
(3) Habitat Management Plan (HMP) development and on-the-ground management.

(4) Design and construction of proposed range, wildlife and watershed developments, including vegetation and riparian treatments.

(5) Supervision of livestock use and monitoring and evaluation of proposals once they have been implemented.

(6) Implementation and management of ORV designations.

These additional costs would total about $130,000, bringing the total annual budget required to implement and manage the plan to about $630,000 in today's dollars.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113°00'
112°00'
110°48'15"
41°03'45"
41°00'
40°00'
39°45'
114°00'
T4N
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T1N
T1S
T2S
T3S
T4S
T5S
T6S
T7S
T8S
T9S
T10S
T11S
T12S
R20W
R19W
R18W
R17W
R16W
R15W
R14W
R13W
R12W
R11W
R10W
R9W
R8W
R7W
R6W
R5W
R4W
R3W
R2W
R1W
R1E
R2E
R3E
R4E
R5E
R6E
R7E
R8E
R9E
R10E
N
Disposal Tracts
0
5
10
15
20 MILES
SCALE
UTAH
JULY, 1987
BOX ELDER CO.
TOOELE CO.
SALT LAKE DESERT
UTAH TEST AND TRAINING RANGE (NORTH RANGE)
UTAH TEST AND TRAINING RANGE (SOUTH RANGE)
DUGWAY PROVING GROUNDS
GREAT SALT LAKE
SALT LAKE BASE LINE
STANSBURY ISLAND
CARRINGTON ISLAND
ANTELOPE ISLAND
DAVIS CO.
TOOELE CO.
SALT LAKE CO.
UTAH CO.
WASATCH CO.
DUCHESNE CO.
JUAB CO.
SANPETE CO.
CARBON CO.
SALT LAKE CITY
Kaysville
Farmington
Centerville
Bountiful
Morgan
Magna
South Salt Lake
Murray
Granger
Kearns
West Jordan
Midvale
Sandy
South Jordan
Riverton
Tooele
Grantsville
Lehi
American Fork
Pleasant Grove
Orem
Provo
Utah Lake
Springville
Mapleton
Spanish Fork
Salem
Payson
Santaquin
Eureka
Mammoth
Goshen
Genola
Benjamin
Lake Shore
Palmyra
WASATCH NATIONAL FOREST
UINTA NATIONAL FOREST
MANTI-LA SAL NATIONAL FOREST
UINTAH AND OURAY INDIAN RESERVATION
GOSHUTE INDIAN RES.
SKULL VALLEY INDIAN RES.
TOOELE ARMY DEPOT (NORTH AREA)
TOOELE ARMY DEPOT (SOUTH AREA)
CAMP WILLIAMS
STANSBURY MOUNTAINS
OQUIRRH MOUNTAINS
ONAQUI MTNS.
SHEEPROCK MOUNTAINS
SIMPSON MOUNTAINS
CEDAR VALLEY
SKULL VALLEY
LAKESIDE MOUNTAINS
PUDDLE VALLEY
CEDAR MOUNTAINS
DUGWAY RANGE
THOMAS RANGE
FISH SPRINGS RANGE
DEEP CREEK MOUNTAINS
WEST TINTIC MTNS.
EAST TINTIC MTNS.
LONG RIDGE
MOUNT NEBO
LOAFER MOUNTAIN
WESTERN PACIFIC RAILROAD
BONNEVILLE SALT FLATS
SILVER ISLAND
2
4
4A
6
8
11
13
14
17
20
21
22
26A
29
31
35
43
44
45
46
49
51
52
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98
101
102
105
107
108
109

FIGURE 1

Disposal Tracts

PONY EXPRESS RESOURCE AREA

SALT LAKE DISTRICT

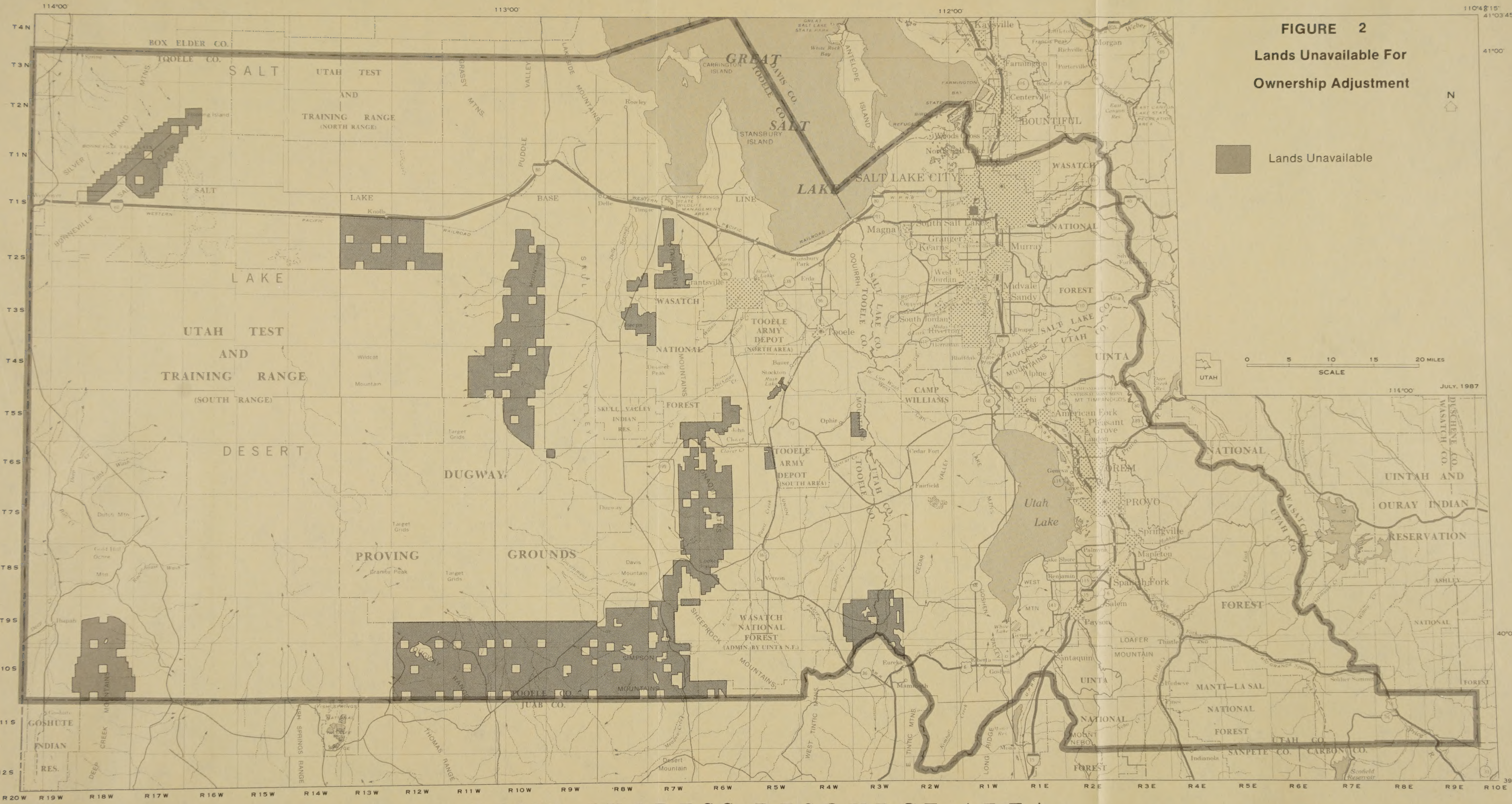

Lands Unavailable
N
SCALE
0 5 10 15 20 MILES
JULY, 1987
UTAH
BOX ELDER CO.
TOOELE CO.
SALT LAKE
UTAH TEST AND TRAINING RANGE (NORTH RANGE)
UTAH TEST AND TRAINING RANGE (SOUTH RANGE)
DESERT
DUGWAY PROVING GROUNDS
GREAT SALT LAKE
DAVIS CO.
SALT LAKE CITY
WASATCH NATIONAL FOREST
TOOELE ARMY DEPOT (NORTH AREA)
TOOELE ARMY DEPOT (SOUTH AREA)
SKULL VALLEY INDIAN RES.
CAMP WILLIAMS
UINTA NATIONAL FOREST
UINTAH AND OURAY INDIAN RESERVATION
MANTI—LA SAL NATIONAL FOREST
GOSHUTE INDIAN RES.
WASATCH NATIONAL FOREST (ADMIN. BY UINTA N.F.)
SALT LAKE CO.
UTAH CO.
JUAB CO.
SANPETE CO.
CARBON CO.
DUCHESNE CO.
WASATCH CO.
Utah Lake
Tooele
Provo
Orem
Bountiful
Murray
Sandy
Lehi
Spanish Fork
Payson
Springville
Eureka
114°00'
113°00'
112°00'
T4N T3N T2N T1N T1S T2S T3S T4S T5S T6S T7S T8S T9S T10S T11S T12S
R20W R19W R18W R17W R16W R15W R14W R13W R12W R11W R10W R9W R8W R7W R6W R5W R4W R3W R2W R1W R1E R2E R3E R4E R5E R6E R7E R8E R9E R10E

FIGURE 2
Lands Unavailable For Ownership Adjustment

PONY EXPRESS RESOURCE AREA

SALT LAKE DISTRICT

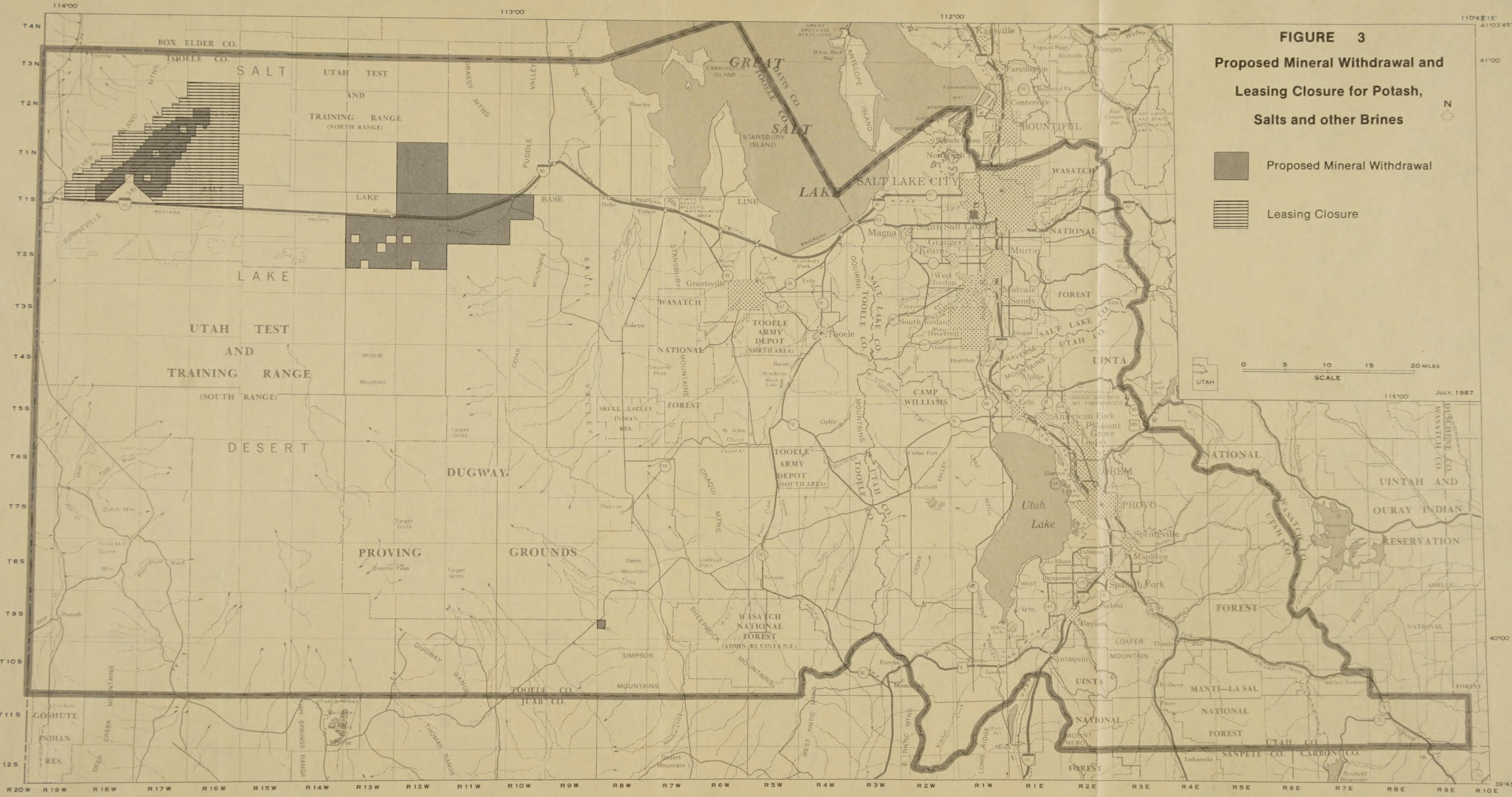


FIGURE 3

Proposed Mineral Withdrawal and Leasing Closure for Potash, Salts and other Brines

Proposed Mineral Withdrawal
Leasing Closure
N
0 5 10 15 20 MILES
SCALE
UTAH
JULY, 1987
114°00'
113°00'
112°00'
110°42'15"
41°03'45"
41°00'
40°00'
39°45'
T4N
T3N
T2N
T1N
T1S
T2S
T3S
T4S
T5S
T6S
T7S
T8S
T9S
T10S
T11S
T12S
R20W
R19W
R18W
R17W
R16W
R15W
R14W
R13W
R12W
R11W
R10W
R9W
R8W
R7W
R6W
R5W
R4W
R3W
R2W
R1W
R1E
R2E
R3E
R4E
R5E
R6E
R7E
R8E
R9E
R10E
BOX ELDER CO.
TOOELE CO.
SALT LAKE
UTAH TEST AND TRAINING RANGE (NORTH RANGE)
UTAH TEST AND TRAINING RANGE (SOUTH RANGE)
DESERT
DUGWAY PROVING GROUNDS
GREAT SALT LAKE
CARRINGTON ISLAND
STANSBURY ISLAND
ANTELOPE ISLAND
DAVIS CO.
TOOELE CO.
SALT LAKE CITY
BOUNTIFUL
Kaysville
Farmington
Centerville
Morgan
Magna
Murray
Midvale
Sandy
Grantsville
Tooele
TOOELE ARMY DEPOT (NORTH AREA)
TOOELE ARMY DEPOT (SOUTH AREA)
WASATCH NATIONAL FOREST
CAMP WILLIAMS
SKULL VALLEY INDIAN RES.
Lehi
American Fork
Pleasant Grove
OREM
PROVO
Utah Lake
Springville
Mapleton
Spanish Fork
Payson
Santaquin
Eureka
Mammoth
UINTA NATIONAL FOREST
MANTI–LA SAL NATIONAL FOREST
UINTAH AND OURAY INDIAN RESERVATION
ASHLEY NATIONAL FOREST
GOSHUTE INDIAN RES.
SALT LAKE CO.
UTAH CO.
WASATCH CO.
DUCHESNE CO.
SANPETE CO.
CARBON CO.
JUAB CO.
TOOELE CO.
SIMPSON MOUNTAINS
SHEEPROCK MOUNTAINS
ONAQUI MTNS
OQUIRRH MOUNTAINS
STANSBURY MOUNTAINS
CEDAR MOUNTAINS
LAKESIDE MOUNTAINS
GRASSY MTNS
DEEP CREEK MOUNTAINS
FISH SPRINGS RANGE
THOMAS RANGE
DUGWAY RANGE
WESTERN PACIFIC RAILROAD
BONNEVILLE
Wendover
Knolls
Delle
Timpie
Ibapah
Vernon
Ophir
Fairfield

PONY EXPRESS RESOURCE AREA

SALT LAKE DISTRICT

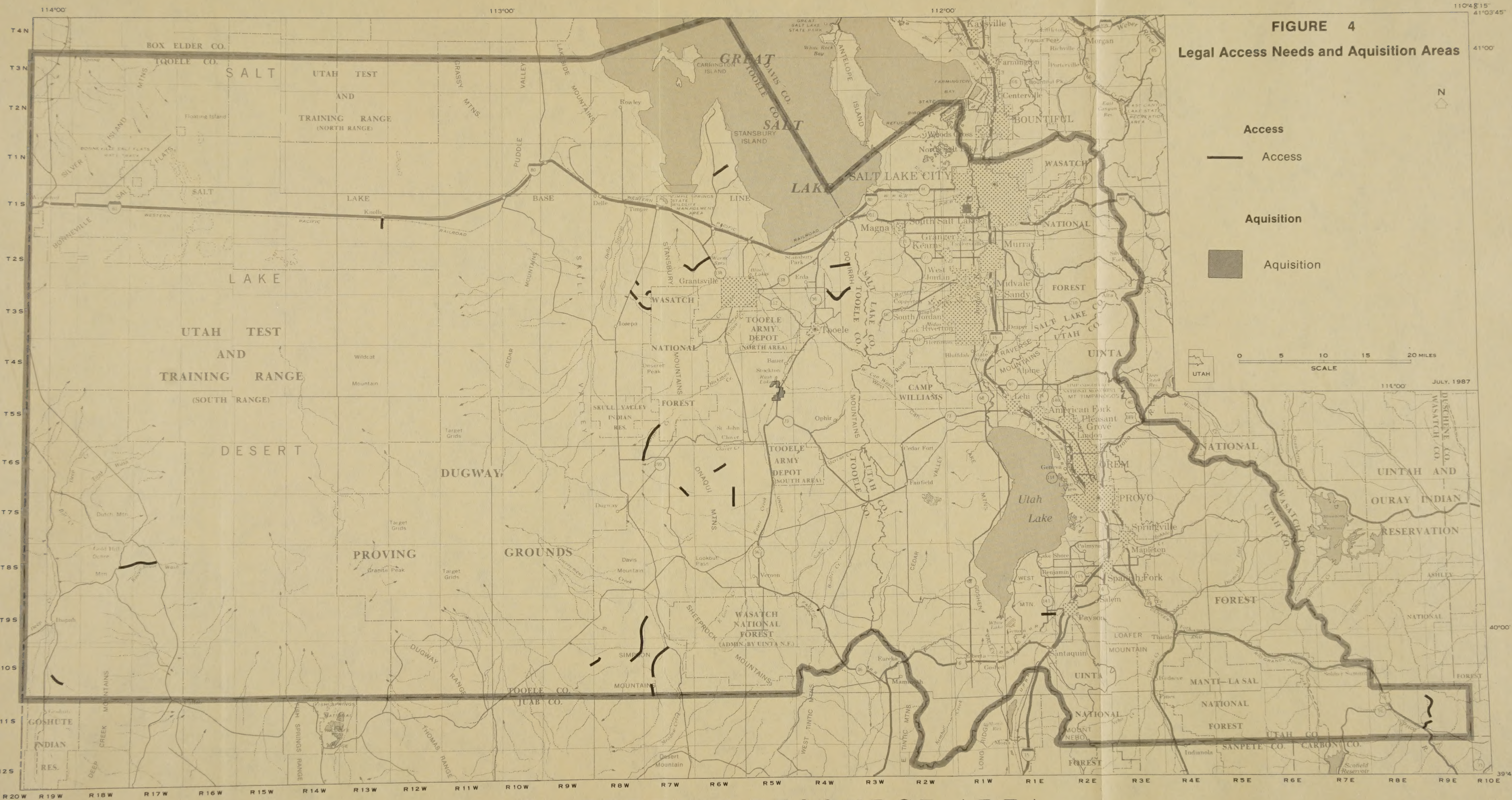


FIGURE 4

Legal Access Needs and Aquisition Areas

Access
Access
Aquisition
Aquisition
N
0 5 10 15 20 MILES
SCALE
UTAH
JULY, 1987
114°00'
113°00'
112°00'
111°00'
110°48'15"
41°03'45"
41°00'
40°00'
39°45'
T4N
T3N
T2N
T1N
T1S
T2S
T3S
T4S
T5S
T6S
T7S
T8S
T9S
T10S
T11S
T12S
R20W R19W R18W R17W R16W R15W R14W R13W R12W R11W R10W R9W R8W R7W R6W R5W R4W R3W R2W R1W R1E R2E R3E R4E R5E R6E R7E R8E R9E R10E
BOX ELDER CO.
TOOELE CO.
SALT LAKE
UTAH TEST AND TRAINING RANGE (NORTH RANGE)
UTAH TEST AND TRAINING RANGE (SOUTH RANGE)
DESERT
DUGWAY PROVING GROUNDS
GREAT SALT LAKE
SALT LAKE CITY
TOOELE ARMY DEPOT (NORTH AREA)
TOOELE ARMY DEPOT (SOUTH AREA)
WASATCH NATIONAL FOREST
SKULL VALLEY INDIAN RES.
GOSHUTE INDIAN RES.
UINTAH AND OURAY INDIAN RESERVATION
MANTI-LA SAL NATIONAL FOREST
UINTA NATIONAL FOREST
Utah Lake
Tooele
Grantsville
Magna
Provo
Orem
Lehi
American Fork
Pleasant Grove
Springville
Spanish Fork
Payson
Santaquin
Eureka
Vernon
Dugway
Ophir
Knolls
Wendover
Ibapah
SIMPSON MOUNTAINS
SHEEPROCK MOUNTAINS
ONAQUI MTNS
STANSBURY MOUNTAINS
OQUIRRH MOUNTAINS
CEDAR MOUNTAINS
TOOELE CO.
JUAB CO.
UTAH CO.
SALT LAKE CO.
DAVIS CO.
WASATCH CO.
SANPETE CO.
CARBON CO.
DUCHESNE CO.

PONY EXPRESS RESOURCE AREA

SALT LAKE DISTRICT

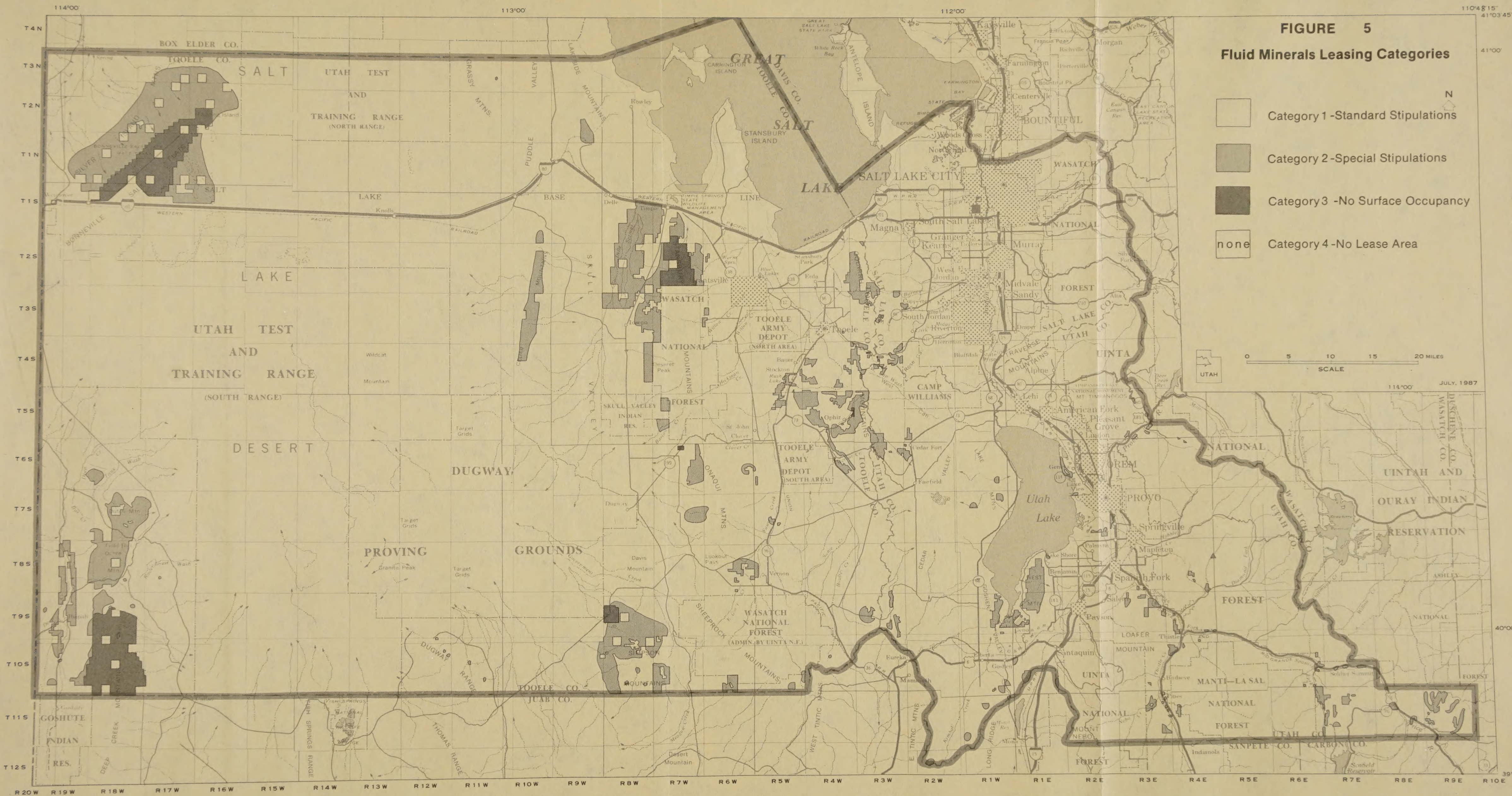


FIGURE 5
Fluid Minerals Leasing Categories
Category 1 -Standard Stipulations
Category 2 -Special Stipulations
Category 3 -No Surface Occupancy
none
Category 4 -No Lease Area
N
0 5 10 15 20 MILES
SCALE
UTAH
JULY, 1987
114°00'
113°00'
112°00'
110°48'15"
41°03'45"
41°00'
40°00'
39°45'
T4N
T3N
T2N
T1N
T1S
T2S
T3S
T4S
T5S
T6S
T7S
T8S
T9S
T10S
T11S
T12S
R20W
R19W
R18W
R17W
R16W
R15W
R14W
R13W
R12W
R11W
R10W
R9W
R8W
R7W
R6W
R5W
R4W
R3W
R2W
R1W
R1E
R2E
R3E
R4E
R5E
R6E
R7E
R8E
R9E
R10E
BOX ELDER CO.
TOOELE CO.
GREAT SALT LAKE
UTAH TEST AND TRAINING RANGE (NORTH RANGE)
UTAH TEST AND TRAINING RANGE (SOUTH RANGE)
DUGWAY PROVING GROUNDS
TOOELE ARMY DEPOT (NORTH AREA)
TOOELE ARMY DEPOT (SOUTH AREA)
CAMP WILLIAMS
WASATCH NATIONAL FOREST
WASATCH NATIONAL FOREST (ADMIN. BY UINTA N.F.)
UINTA NATIONAL FOREST
MANTI—LA SAL NATIONAL FOREST
UINTAH AND OURAY INDIAN RESERVATION
GOSHUTE INDIAN RES.
SKULL VALLEY INDIAN RES.
SALT LAKE CITY
BOUNTIFUL
Magna
Tooele
Lehi
American Fork
OREM
PROVO
Springville
Spanish Fork
Payson
Santaquin
Nephi
Utah Lake
STANSBURY ISLAND
ANTELOPE ISLAND
CARRINGTON ISLAND
DAVIS CO.
SALT LAKE CO.
UTAH CO.
JUAB CO.
WASATCH CO.
SANPETE CO.
CARBON CO.
DUCHESNE CO.
SHEEPROCK MOUNTAINS
ONAQUI MTNS
STANSBURY MOUNTAINS
OQUIRRH MOUNTAINS
SIMPSON MOUNTAINS
DEEP CREEK MOUNTAINS
LOAFER MOUNTAIN

PONY EXPRESS RESOURCE AREA

SALT LAKE DISTRICT

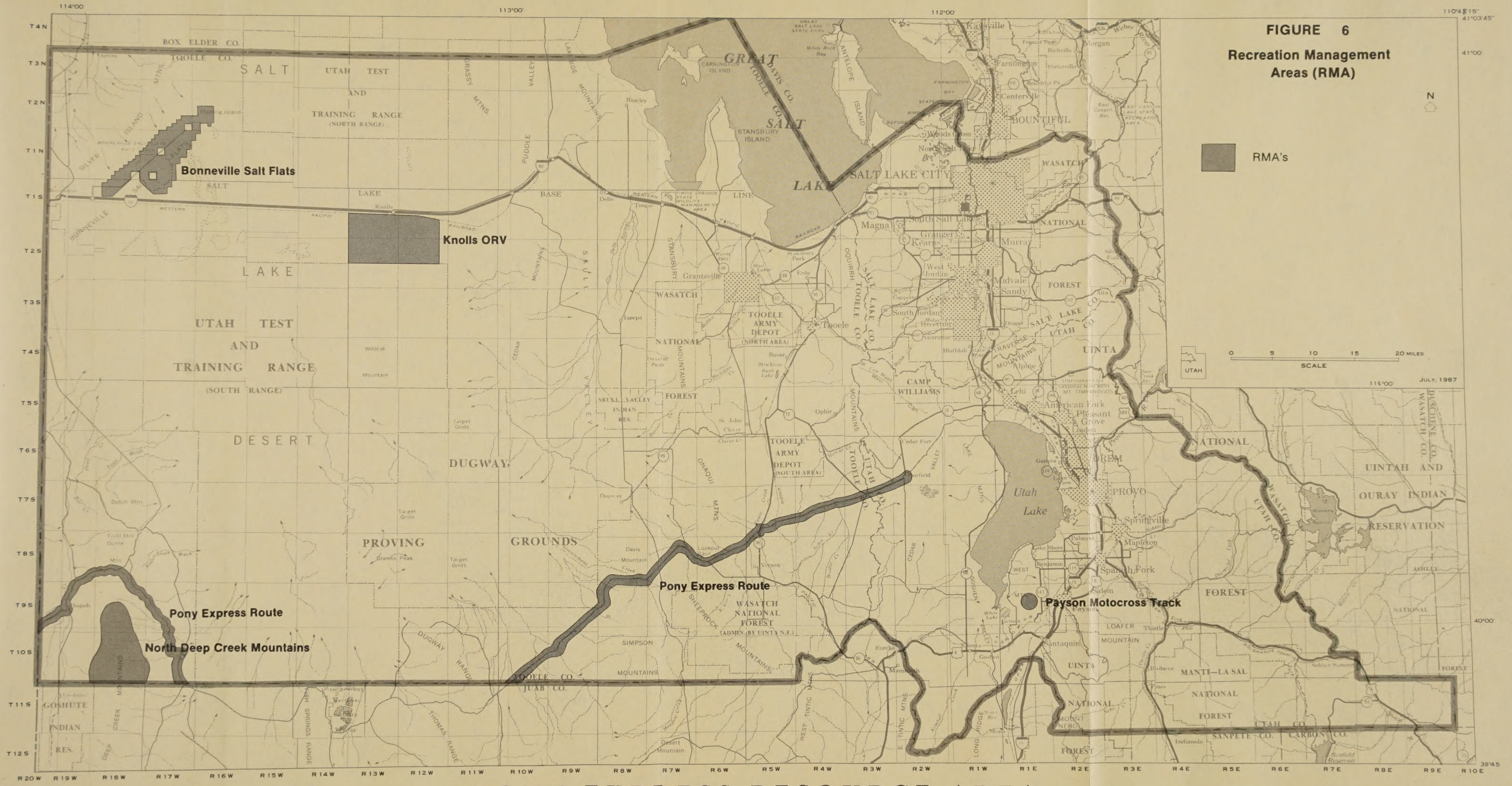


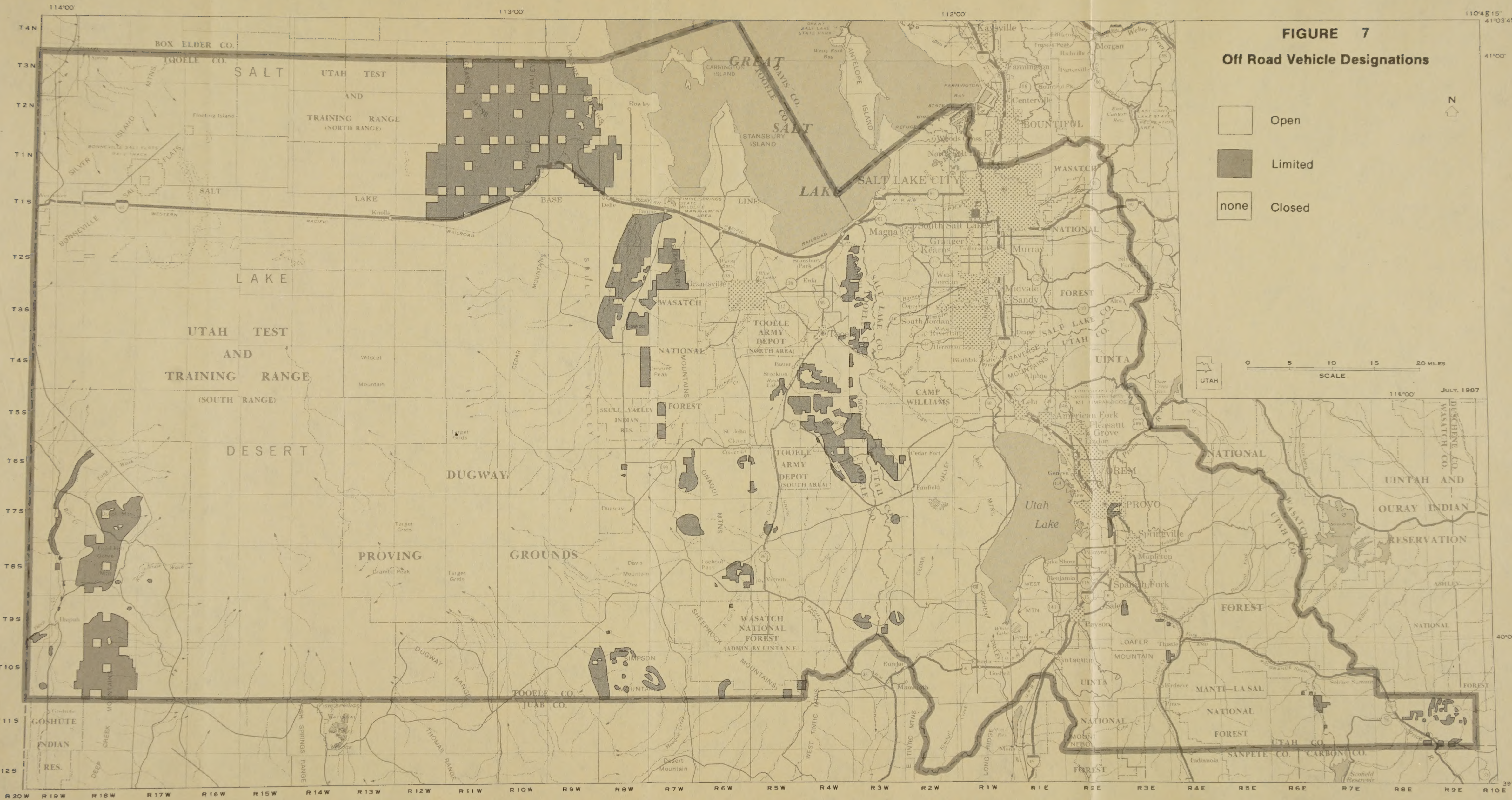
FIGURE 6

Recreation Management Areas (RMA)

RMA's
Bonneville Salt Flats
Knolls ORV
Pony Express Route
Pony Express Route
North Deep Creek Mountains
Payson Motocross Track
N
SCALE
0 5 10 15 20 MILES
UTAH
JULY, 1987
114°00'
113°00'
112°00'
110°48'15"
41°03'45"
41°00'
40°00'
39°45'
UTAH TEST AND TRAINING RANGE (NORTH RANGE)
UTAH TEST AND TRAINING RANGE (SOUTH RANGE)
DUGWAY PROVING GROUNDS
GREAT SALT LAKE
SALT LAKE DESERT
SALT LAKE CITY
TOOELE ARMY DEPOT (NORTH AREA)
TOOELE ARMY DEPOT (SOUTH AREA)
SKULL VALLEY INDIAN RES.
GOSHUTE INDIAN RES.
UINTAH AND OURAY INDIAN RESERVATION
WASATCH NATIONAL FOREST
UINTA NATIONAL FOREST
MANTI-LA SAL NATIONAL FOREST
Utah Lake
Tooele
Provo
T4N T3N T2N T1N T1S T2S T3S T4S T5S T6S T7S T8S T9S T10S T11S T12S
R20W R19W R18W R17W R16W R15W R14W R13W R12W R11W R10W R9W R8W R7W R6W R5W R4W R3W R2W R1W R1E R2E R3E R4E R5E R6E R7E R8E R9E R10E

PONY EXPRESS RESOURCE AREA

SALT LAKE DISTRICT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113°00'
112°00'
110°48'15"
41°03'45"
41°00'
40°00'
39°45'
T4N
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T2N
T1N
T1S
T2S
T3S
T4S
T5S
T6S
T7S
T8S
T9S
T10S
T11S
T12S
R20W
R19W
R18W
R17W
R16W
R15W
R14W
R13W
R12W
R11W
R10W
R9W
R8W
R7W
R6W
R5W
R4W
R3W
R2W
R1W
R1E
R2E
R3E
R4E
R5E
R6E
R7E
R8E
R9E
R10E
Open
Limited
none
Closed
N
0
5
10
15
20 MILES
SCALE
UTAH
114°00'
JULY, 1987
BOX ELDER CO.
TOOELE CO.
SALT
LAKE
DESERT
UTAH TEST AND TRAINING RANGE (NORTH RANGE)
UTAH TEST AND TRAINING RANGE (SOUTH RANGE)
DUGWAY
PROVING
GROUNDS
GREAT
SALT
LAKE
CARRINGTON ISLAND
STANSBURY ISLAND
ANTELOPE ISLAND
DAVIS CO.
TOOELE CO.
SALT LAKE CITY
WESTERN PACIFIC RAILROAD
BONNEVILLE
SILVER ISLAND MTNS.
BONNEVILLE SALT FLATS
Floating Island
Knolls
Delle
Timpie
Rowley
Grantsville
WASATCH
NATIONAL
FOREST
TOOELE ARMY DEPOT (NORTH AREA)
TOOELE ARMY DEPOT (SOUTH AREA)
SKULL VALLEY INDIAN RES.
SKULL VALLEY
CEDAR MOUNTAINS
ONAQUI MTNS.
Dugway
Target Grids
Wildcat Mountain
Granite Peak
Davis Mountain
Lookout Pass
Vernon
SHEEPROCK MOUNTAINS
WASATCH NATIONAL FOREST (ADMIN. BY UINTA N.F.)
SIMPSON MOUNTAINS
DUGWAY RANGE
TOOELE CO.
JUAB CO.
GOSHUTE INDIAN RES.
DEEP CREEK MOUNTAINS
Ibapah
FISH SPRINGS
FISH SPRINGS RANGE
THOMAS RANGE
Desert Mountain
WEST TINTIC MTNS.
E. TINTIC MTNS.
Eureka
Mammoth
Goshen
LONG RIDGE
MOUNT NEBO
Nephi
Magna
South Salt Lake
Granger
Kearns
Murray
West Jordan
Midvale
Sandy
South Jordan
Riverton
Draper
Bluffdale
Alpine
Lehi
American Fork
Pleasant Grove
Lindon
Orem
PROVO
Springville
Mapleton
Spanish Fork
Salem
Payson
Santaquin
Utah Lake
WEST MTN
Benjamin
Lake Shore
Palmyra
Geneva
CAMP WILLIAMS
TRAVERSE MOUNTAINS
SALT LAKE CO.
UTAH CO.
UINTA
Kaysville
Farmington
Centerville
BOUNTIFUL
Morgan
Woods Cross
North Salt Lake
Erda
Stansbury Park
Tooele
Stockton
St. John
Clover
Rush Valley
Fairfield
Cedar Fort
CEDAR VALLEY
LOAFER MOUNTAIN
Thistle
MANTI–LA SAL NATIONAL FOREST
SANPETE CO.
UTAH CO.
CARBON CO.
Indianola
UINTAH AND OURAY INDIAN RESERVATION
DUCHESNE CO.
WASATCH CO.
UTAH CO.
WASATCH CO.
Scofield Reservoir

FIGURE 7

Off Road Vehicle Designations

PONY EXPRESS RESOURCE AREA

SALT LAKE DISTRICT

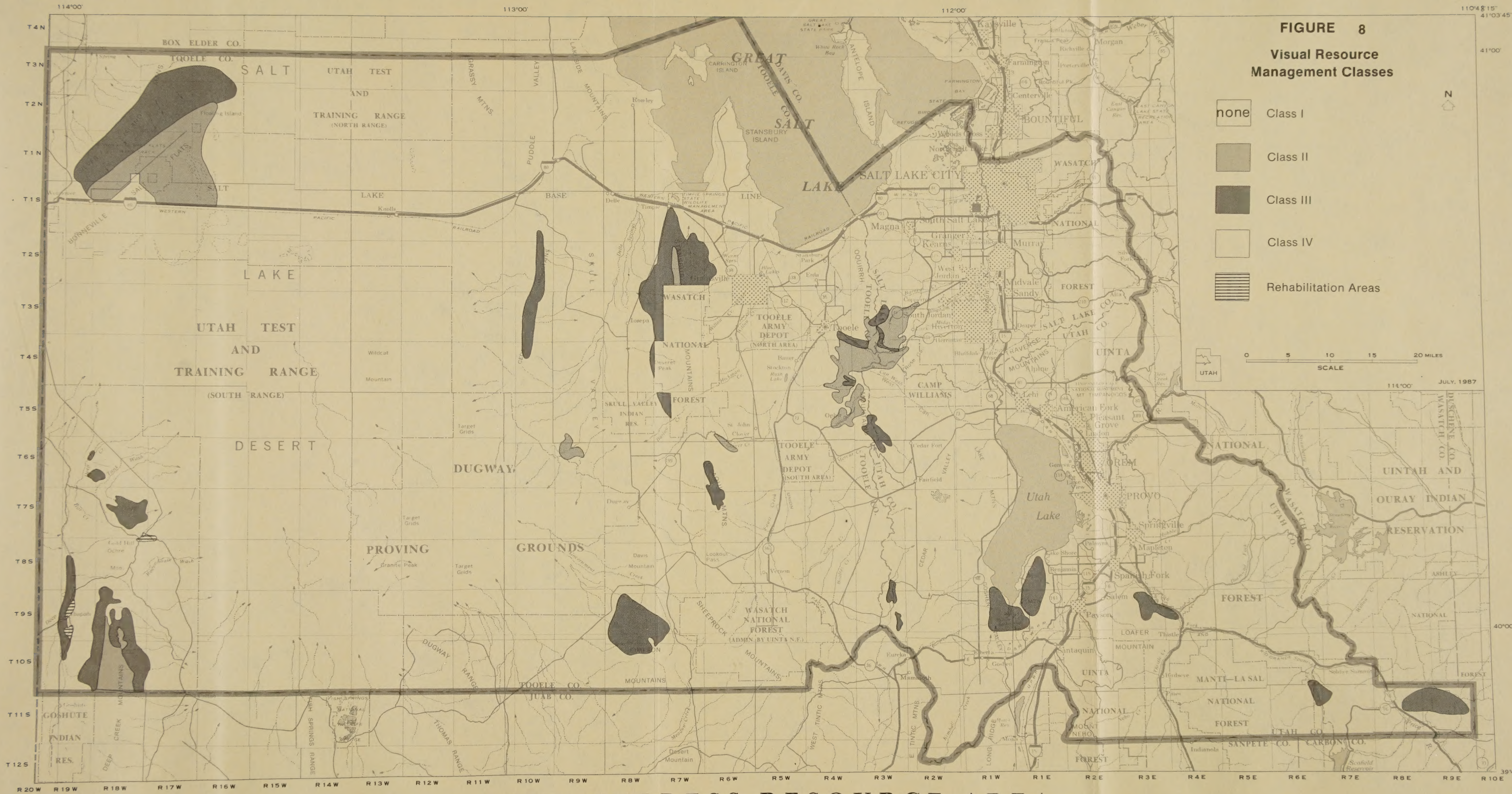
none
Class I
Class II
Class III
Class IV
Rehabilitation Areas
N
0 5 10 15 20 MILES
SCALE
UTAH
JULY, 1987
114°00'
113°00'
112°00'
110°48'15"
41°03'45"
41°00'
40°00'
39°45'
111°00'
T4N
T3N
T2N
T1N
T1S
T2S
T3S
T4S
T5S
T6S
T7S
T8S
T9S
T10S
T11S
T12S
R20W
R19W
R18W
R17W
R16W
R15W
R14W
R13W
R12W
R11W
R10W
R9W
R8W
R7W
R6W
R5W
R4W
R3W
R2W
R1W
R1E
R2E
R3E
R4E
R5E
R6E
R7E
R8E
R9E
R10E
BOX ELDER CO.
TOOELE CO.
SALT LAKE DESERT
UTAH TEST AND TRAINING RANGE (NORTH RANGE)
UTAH TEST AND TRAINING RANGE (SOUTH RANGE)
DUGWAY PROVING GROUNDS
GREAT SALT LAKE
TOOELE CO.
DAVIS CO.
STANSBURY ISLAND
CARRINGTON ISLAND
ANTELOPE ISLAND
SALT LAKE CITY
WASATCH NATIONAL FOREST
TOOELE ARMY DEPOT (NORTH AREA)
TOOELE ARMY DEPOT (SOUTH AREA)
SKULL VALLEY INDIAN RES.
CAMP WILLIAMS
Tooele
Grantsville
Magna
Kearns
Murray
Midvale
Sandy
South Jordan
Riverton
Bountiful
Centerville
Farmington
Kaysville
Morgan
Lehi
American Fork
Pleasant Grove
Orem
PROVO
Springville
Mapleton
Spanish Fork
Salem
Payson
Santaquin
Utah Lake
UINTA NATIONAL FOREST
UINTAH AND OURAY INDIAN RESERVATION
MANTI–LA SAL NATIONAL FOREST
WASATCH NATIONAL FOREST (ADMIN. BY UINTA N.F.)
SHEEPROCK MOUNTAINS
SIMPSON MOUNTAINS
DUGWAY RANGE
THOMAS RANGE
FISH SPRINGS RANGE
GOSHUTE INDIAN RES.
DEEP CREEK MOUNTAINS
TOOELE CO.
JUAB CO.
UTAH CO.
SANPETE CO.
CARBON CO.
DUCHESNE CO.
WASATCH CO.
SALT LAKE CO.
LOAFER MOUNTAIN
Eureka
Mammoth
Nephi
Scofield Reservoir

FIGURE 8

Visual Resource Management Classes

PONY EXPRESS RESOURCE AREA

SALT LAKE DISTRICT

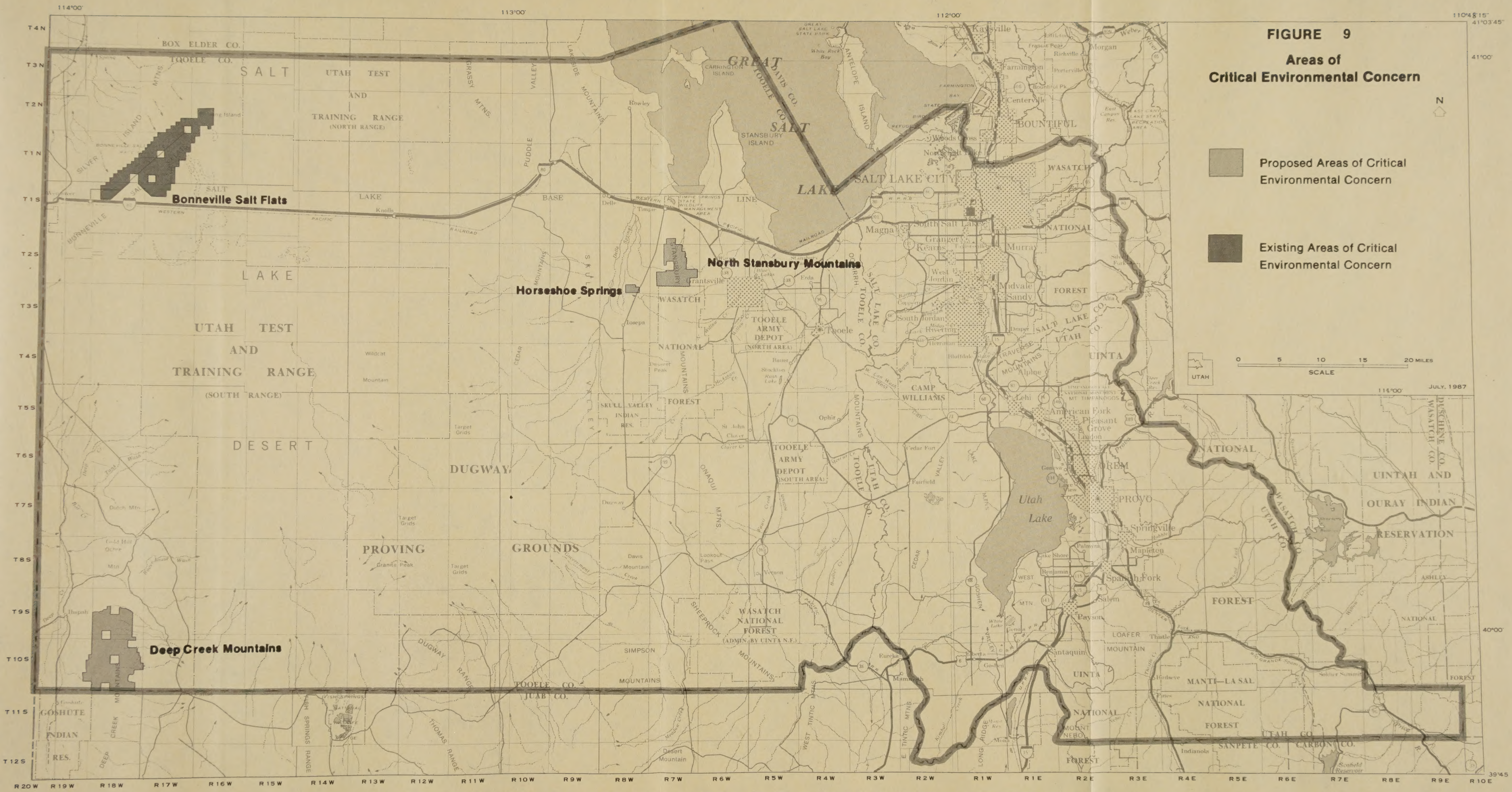
FIGURE 9

Areas of Critical Environmental Concern

Proposed Areas of Critical Environmental Concern
Existing Areas of Critical Environmental Concern
Bonneville Salt Flats
North Stansbury Mountains
Horseshoe Springs
Deep Creek Mountains
UTAH TEST AND TRAINING RANGE (NORTH RANGE)
UTAH TEST AND TRAINING RANGE (SOUTH RANGE)
GREAT SALT LAKE
SALT LAKE DESERT
DUGWAY PROVING GROUNDS
TOOELE ARMY DEPOT (NORTH AREA)
TOOELE ARMY DEPOT (SOUTH AREA)
SKULL VALLEY INDIAN RES.
GOSHUTE INDIAN RES.
UINTAH AND OURAY INDIAN RESERVATION
WASATCH NATIONAL FOREST
UINTA NATIONAL FOREST
MANTI—LA SAL NATIONAL FOREST
CAMP WILLIAMS
SALT LAKE CITY
Utah Lake
TOOELE CO.
JUAB CO.
UTAH CO.
SALT LAKE CO.
BOX ELDER CO.
DAVIS CO.
N
0 5 10 15 20 MILES
SCALE
UTAH
JULY, 1987
114°00'
113°00'
112°00'
110°48'15"
41°03'45"
41°00'
40°00'
39°45'
T4N
T3N
T2N
T1N
T1S
T2S
T3S
T4S
T5S
T6S
T7S
T8S
T9S
T10S
T11S
T12S
R20W
R19W
R18W
R17W
R16W
R15W
R14W
R13W
R12W
R11W
R10W
R9W
R8W
R7W
R6W
R5W
R4W
R3W
R2W
R1W
R1E
R2E
R3E
R4E
R5E
R6E
R7E
R8E
R9E
R10E

PONY EXPRESS RESOURCE AREA

SALT LAKE DISTRICT

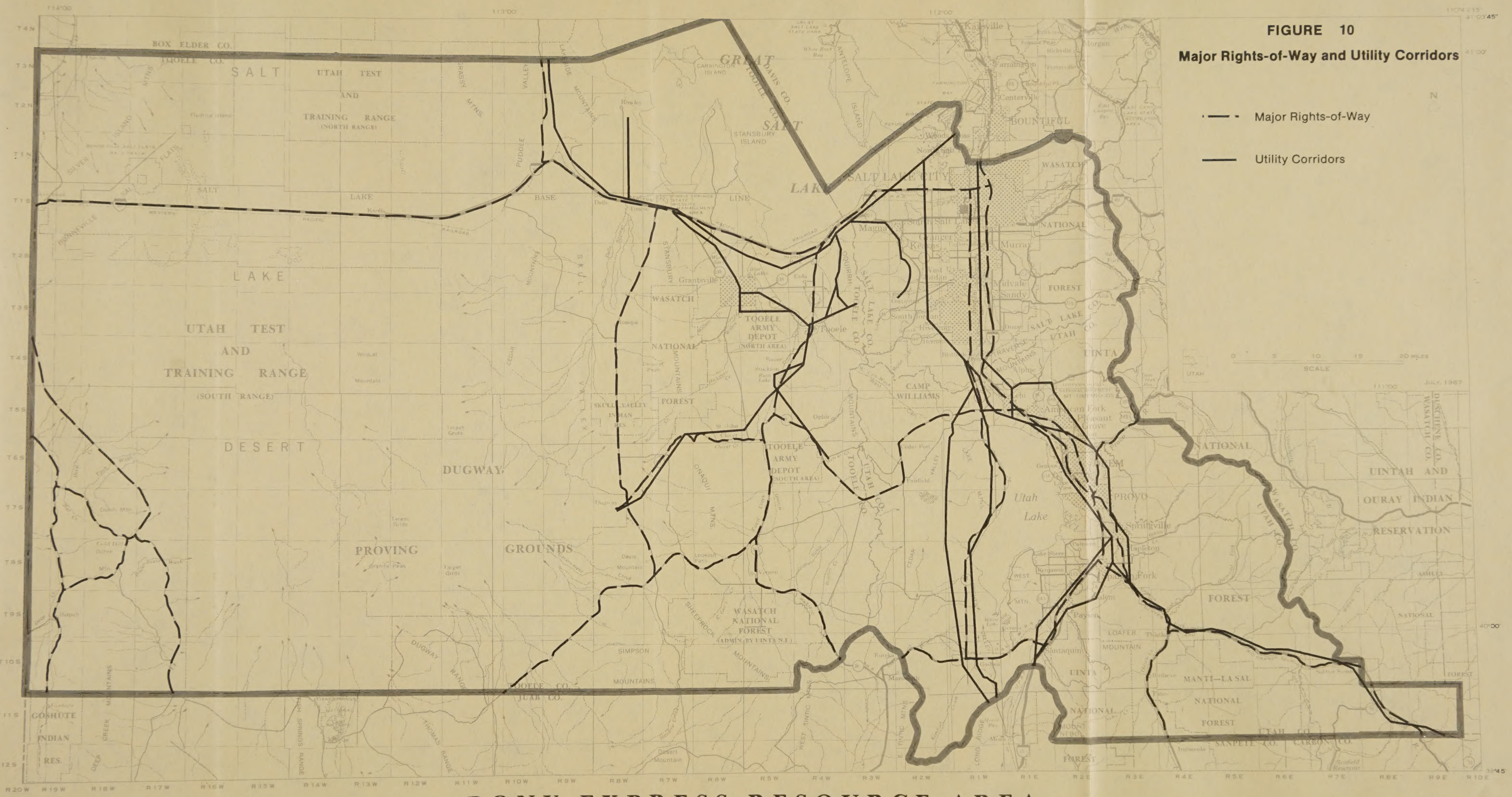

FIGURE 10

Major Rights-of-Way and Utility Corridors

Major Rights-of-Way
Utility Corridors
N
0 5 10 15 20 MILES
SCALE
JULY, 1987
BOX ELDER CO.
TOOELE CO.
SALT LAKE
UTAH TEST AND TRAINING RANGE (NORTH RANGE)
UTAH TEST AND TRAINING RANGE (SOUTH RANGE)
DESERT
DUGWAY PROVING GROUNDS
GREAT SALT LAKE
DAVIS CO.
SALT LAKE CITY
STANSBURY ISLAND
ANTELOPE ISLAND
Grantsville
Tooele
TOOELE ARMY DEPOT (NORTH AREA)
TOOELE ARMY DEPOT (SOUTH AREA)
WASATCH NATIONAL FOREST
WASATCH NATIONAL FOREST (ADMIN. BY UINTA N.F.)
SKULL VALLEY INDIAN RES.
CAMP WILLIAMS
SALT LAKE CO.
UTAH CO.
JUAB CO.
Utah Lake
PROVO
Springville
Spanish Fork
Payson
Bountiful
Murray
Midvale
Sandy
UINTA NATIONAL FOREST
MANTI–LA SAL NATIONAL FOREST
UINTAH AND OURAY INDIAN RESERVATION
DUCHESNE CO.
WASATCH CO.
SANPETE CO.
CARBON CO.
GOSHUTE INDIAN RES.
SIMPSON MOUNTAINS
SHEEPROCK MOUNTAINS
ONAQUI MTNS.
OQUIRRH MOUNTAINS
STANSBURY MOUNTAINS
CEDAR MOUNTAINS
DUGWAY RANGE
SKULL VALLEY
LOAFER MOUNTAIN
WESTERN PACIFIC RAILROAD
114°00'
113°00'
112°00'
40°00'
39°45'
T4N
T3N
T2N
T1N
T1S
T2S
T3S
T4S
T5S
T6S
T7S
T8S
T9S
T10S
T11S
T12S
R20W
R19W
R18W
R17W
R16W
R15W
R14W
R13W
R12W
R11W
R10W
R9W
R8W
R7W
R6W
R5W
R4W
R3W
R2W
R1W
R1E
R2E
R3E
R4E
R5E
R6E
R7E
R8E
R9E
R10E

PONY EXPRESS RESOURCE AREA

SALT LAKE DISTRICT

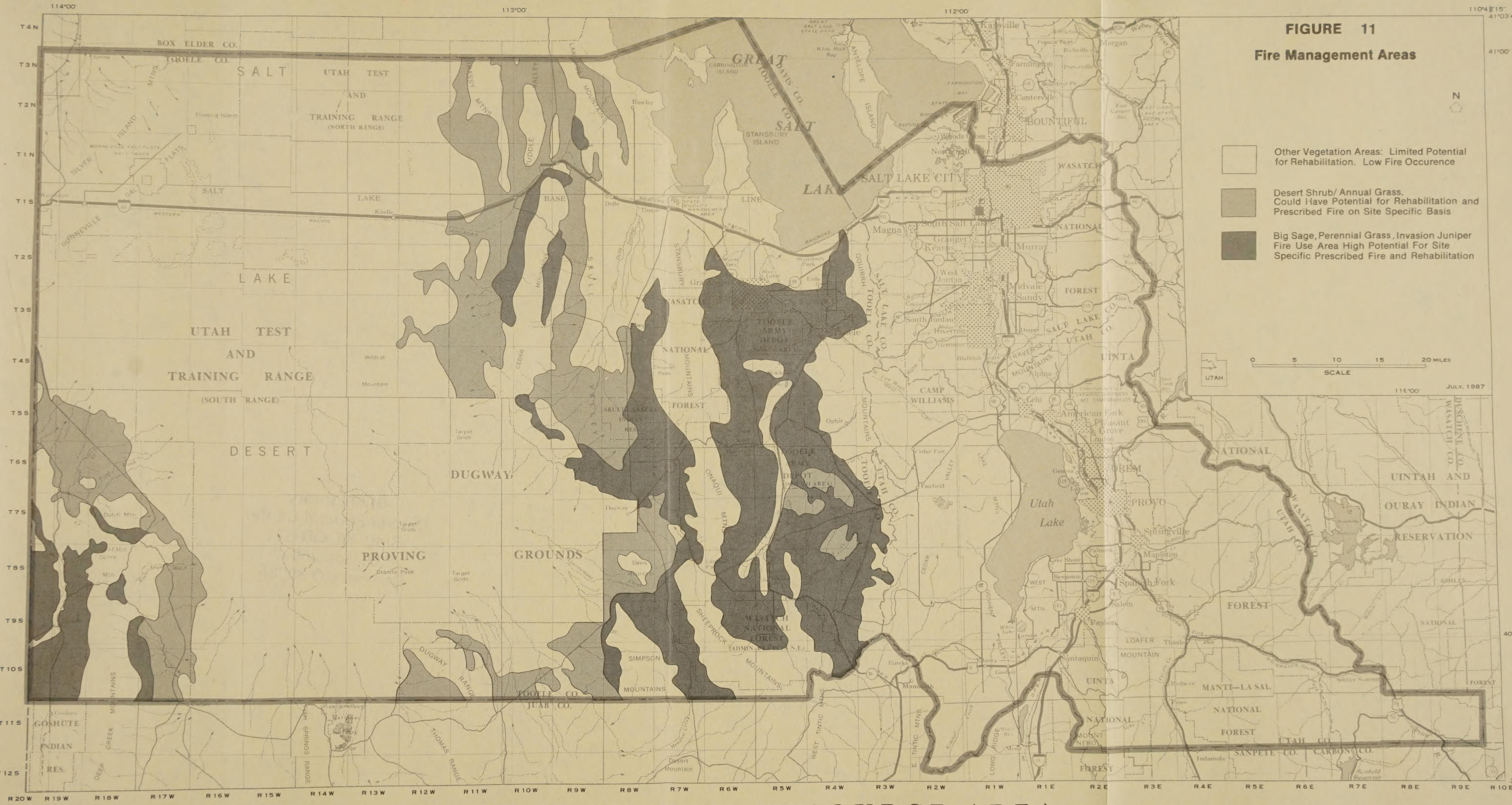
FIGURE 11
Fire Management Areas
N
Other Vegetation Areas: Limited Potential for Rehabilitation. Low Fire Occurence
Desert Shrub/ Annual Grass. Could Have Potential for Rehabilitation and Prescribed Fire on Site Specific Basis
Big Sage, Perennial Grass, Invasion Juniper Fire Use Area High Potential For Site Specific Prescribed Fire and Rehabilitation
0 5 10 15 20 MILES
SCALE
UTAH
JULY, 1987
114°00'
113°00'
112°00'
110°48'15"
41°03'45"
41°00'
40°00'
39°45'
T4N
T3N
T2N
T1N
T1S
T2S
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R16W
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R12W
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R10W
R9W
R8W
R7W
R6W
R5W
R4W
R3W
R2W
R1W
R1E
R2E
R3E
R4E
R5E
R6E
R7E
R8E
R9E
R10E
BOX ELDER CO.
TOOELE CO.
SALT LAKE
UTAH TEST AND TRAINING RANGE (NORTH RANGE)
UTAH TEST AND TRAINING RANGE (SOUTH RANGE)
GREAT SALT LAKE
DAVIS CO.
TOOELE CO.
STANSBURY ISLAND
CARRINGTON ISLAND
ANTELOPE ISLAND
SALT LAKE CITY
DESERT
DUGWAY PROVING GROUNDS
TOOELE ARMY DEPOT
WASATCH NATIONAL FOREST
WASATCH NATIONAL FOREST (ADMIN. BY UINTA N.F.)
SKULL VALLEY INDIAN RES.
SHEEPROCK MOUNTAINS
SIMPSON MOUNTAINS
DUGWAY RANGE
ONAQUI MTNS.
OQUIRRH MOUNTAINS
TOOELE CO.
SALT LAKE CO.
UTAH CO.
JUAB CO.
CAMP WILLIAMS
Utah Lake
PROVO
OREM
UINTA NATIONAL FOREST
UINTAH AND OURAY INDIAN RESERVATION
DUCHESNE CO.
WASATCH CO.
MANTI-LA SAL NATIONAL FOREST
SANPETE CO.
CARBON CO.
GOSHUTE INDIAN RES.
DEEP CREEK MOUNTAINS
THOMAS RANGE
WEST TINTIC MTNS.
TINTIC MTNS.
LOAFER MOUNTAIN
MOUNT NEBO
Kaysville
Farmington
Centerville
Bountiful
Morgan
Magna
Murray
Midvale
Sandy
West Jordan
South Jordan
Riverton
Lehi
American Fork
Pleasant Grove
Springville
Mapleton
Spanish Fork
Salem
Payson
Santaquin
Eureka
Mammoth
Goshen
Dugway
Ophir
Rowley
Grantsville
Stockton
Fairfield
Cedar Fort
Alpine
Indianola
Thistle
Scofield Reservoir

PONY EXPRESS RESOURCE AREA

SALT LAKE DISTRICT

BLM Library
Denver Federal Center
Bldg. 85, OC-521
P.O. Box 25047
Denver, CO 80225

The Final Environmental Impact Statement

Introduction

This portion of the document is the Final Environmental Impact Statement. It contains the comments on the Draft RMP/EIS and BLM's responses to those comments. It also contains the revisions and corrections of the Draft RMP/EIS.

Consultation and Coordination

Federal, State, and Local agencies involved in preparation of the Proposed RMP through consultation and coordination are identified on page 207 of the Draft RMP.

Coordination in Review of the Draft RMP/EIS

The Draft Pony Express Resource Management Plan and Environmental Impact Statement was filed with the Environmental Protection Agency on May 13, 1988. Its availability and the time and place for three public open houses were announced in the Federal Register on May 6, 1985. A news release was also issued to notify interested people about the comment period on the Draft RMP/EIS. August 15, 1988 was the deadline for submission of written comments. The list of agencies, organizations, and individuals who received copies of the Draft RMP/EIS is available for review at the Salt Lake District Office

Public open houses were held June 28 at Provo and Tooele, and June 29 at Wendover to explain the contents of the Draft RMP/EIS and the process for commenting.

All written comments were reviewed for consideration in preparation of the Proposed RMP and Final EIS. Those comments which presented new data, questioned the facts or analysis presented, or raised questions or issues which related directly to the scope of the Draft RMP and EIS have been given a response. Testimonies or letters which were general or simply indicated a preference for an alternative have been included in this document but were not given a response. Comments which were received too late for inclusion in the Final EIS will be given consideration in the decision-making process

A 30-day protest period will be provided for public protests on the Proposed Plan and Final EIS. If no protests are received, a formal Record of Decision will be issued following completion of the 30-day period.

The Proposed RMP is consistent with the plans and policies of Utah County. It may not be consistent with some of the plans and policies of Tooele County. Areas of inconsistency include ORV designations, proposals for ACECS in the North Stansbury and North Deep Creek Mountains, criteria which BLM would follow in doing land exchanges, and overlap by a proposed Special Recreation Management Area on 7,700 acres designated by the County for possible future siting of hazardous waste disposal facilities.

BLM learned of the County's concerns after the close of the comment period, and therefore, sufficient time was not available to resolve the concerns without significant delay in completing the plan. BLM will work with the County to resolve inconsistencies as the plan is implemented, monitored and maintained. Plan amendments will be considered as necessary.

Comment Letters

Letters commenting on the Draft RMP/EIS were received from the following organizations and individuals. (Letters listed in the order they were received.)

Letter Number	Commentor/Signature
1	U.S. Bureau of Mines / Williams
2	State of Utah, Division of State History / Powell
3	Amax Magnesium / Brown
4	Doyle Berry / Berry
5	South Shore Farms / McMullin
6	Utah Petrolium Association / Peacock
7	U.S. Fish and Wildlife Service / Ruesink
8	Utah Salt Flats Racing Association / West
9	Dorothy Wiskowski, Ronald Weber / Wiskowski, Weber
10	U.S. Geological Survey / Devine
11	State of Utah, Division of Environmental Health / Reichart
12	Utah Farm Bureau Federation / Christy
13	Mr. and Mrs. B. N. Allen / Allen
14	Reilly - Wendover / Fendt, Wadsworth
15	Douglas E. Larson, Calvin E. Olsen / Larson, Olsen
16	Tooele Army Depot / Tateyama
17	Tooele County / Pitt
18	Utah Wildlife Federation / Sackett
19	U.S. Department of Health and Human Services / Andlison
20	Sierra Club, Utah Chapter / Lukez
21	Tooele County Industrial Development Corporation / Tate

22	State of Utah - Office of the Governor / Bangerter
23	Utah Nature Study Society / Hovingh
24	Tooele County Historical Society / Miller
25	Daniel Dreak / Dreak
26	U.S. Environmental Protection Agency / DeSpain
27	Newall A. Johnson / Johnson
28	Tooele County Wildlife Federation / Ekenstam
29	Geological Research Service / Palmer, Johnston
30	National Park Service / Strait

The following section contains copies of all letters received along with the responses to comments.

Comment Letter 1

United States Department of the Interior
BUREAU OF MINES
P. O. BOX 25086
BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

Intermountain Field Operations Center

June 10, 1988

Memorandum

To: Howard Hedrick, Pony Express Resource Area Manager, Bureau of Land Management, 2370 South 2300 West, Salt Lake City, Utah 84119

From: Chief, Intermountain Field Operations Center

Subject: Review of Draft Pony Express Resource Management Plan (RMP) /Environmental Impact Statement (EIS)

As requested, Bureau of Mines personnel have reviewed the subject draft resource management plan/environmental impact statement for involvement with mineral resources and industry.

The document, prepared by the Bureau of Land Management, Salt Lake City District, discusses resource management plans on approximately 2 million acres of public land administered by the Bureau of Land Management in Tooele, Utah, and Salt Lake Counties.

1.1 Minerals are discussed on pages 72-74 by the categories: fluid, solid leasable, locatable, and salable. Overall, we were pleased to note that mineral resources and producing operations are adequately discussed. A survey of our files, however, indicates that salt resources occur along the southern boundary of the Great Salt Lake, northwest of Stansbury Park, Tooele County, and a uranium resource occurs in the West Mountain area, Utah County. We suggest these two resources be added to the mineral section of the subject report. Thank you for the opportunity to comment.

B Williams
For William Cochran

Response to Letter 1

1.1 The change you recommended has been made. See Revisions and Corrections for page 73.

Comment Letter 2

Division of State History
(Utah State Historical Society)
Department of Community and Economic Development

Norman H. Bangerter
Governor
Max J. Evans
Director

300 Rio Grande
Salt Lake City, Utah 84101-1182

June 20, 1988

Mr. John H. Stephenson
Acting District Manager
Bureau of Land Management
Salt Lake District Office
2370 South 2300 West
Salt Lake City, Utah 84119

RE: Draft Pony Express Resource Management Plan/Environmental Impact Statemen
(SAI UT880524-070)

In Reply Please Refer to Case No. L224

Dear Mr. Stephenson:

The staff of the Utah State Historic Preservation Office appreciates the opportunity to comment on the draft version of the Pony Express Resource Management Plan and Environmental Impact Statement. Our office offers the following comments.

2.1 We note that a sensitivity map has been provided for paleontology. Our office feels that a similar sensitivity map, depicting the sensitivity zones for cultural resources within the Pony Express Resource Area, might be a good idea

2.2 The preferred alternative, or alternative number 2, appears to consider cultural resources in an adequate manner. Under this alternative there will be a disposal of fifty tracts of land comprising 9,088 acres. Our office is concerned about the appropriate treatment of cultural resources on these tracts of land prior to their removal from public ownership. Under 36 CFR 800.4, the Bureau of Land Management is responsible for identifying historic properties, and then in assessing the effects of any BLM-sponsored undertakings on these historic properties, which is covered under 36 CFR 800.5. The definition for an undertaking under 36 CFR 800.2(o) is "Any project, activity or program that can result in changes in the character or use of a historic property." This means that any project which is under the direct or indirect jurisdiction of a federal agency that will affect historic properties, must consider their effect upon historic properties. Our office considers the transfer of public land into private ownership an undertaking in which any historic properties on those tracts of land could be adversely affected. We would hope that the Pony Express Resource Area would consider the effects on historic properties for any transfer of public lands.

Board of State History Thomas G. Alexander Chairman • Dean L. May Vice Chairman • Douglas D. Alder
Phillip A. Bullen • Ellen G. Callister • J. Eldon Dorman • Hugh C. Garner • Dan E. Jones • Leonard J. Arrington • Amy Allen Price • Sunny Ke

---

Response to Letter 2

2.1 A sensitivity map for cultural resources is not proposed. Currently, the district archeologist makes a determination of sensitivity based upon personal knowledge of the known resources. As mentioned on several occasions by the SHPO's staff, this method is not backed by a valid statistical sample of the entire Resource Area. Therefore, we do not intend to put such a map on paper. BLM is currently engaged in a study of predictive modeling and its applicability on public lands. When this study is completed, the Salt Lake District will follow its recommendations in developing a predictive model for the Pony Express Resource Area. Until that time, we believe that it is best not to have a formal map.

2.2 We agree with your comment that the transfer of public land into private ownership is an undertaking as defined by 36 CFR 800.

As proposed in this document, cultural resource management would be the same under all of the alternatives. The management set forth (pages 50-51 of the Draft RMP/EIS) is the same as the procedure now followed, and is in compliance with 36 CFR 800. Prior to disposal of any parcels of public land, BLM will assess the effects of that action upon any cultural resources. In many (most) cases, this will mean that a cultural resources inventory will be completed as part of the project assessment.

Comment Letter 2

Thank you again for the opportunity of commenting on this draft document. We look forward to seeing the final management plan and environmental impact statement. The above is provided on request as outlined by 36 CFR 800 or Utah Code, Title 63-18-37. If you have questions or need additional assistance, please contact Diana Christensen at (801) 533-7039, or 533-6017.

Sincerely,

A. Kent Powell
Deputy State Historic
Preservation Officer

DC:L224/5657V BLM/OR

cc to Resource Development Coordinating Committee, State Planning Office, 118 State Capitol, Salt Lake City, Utah 84114

Comment Letter 3

AMAX Magnesium
238 North 2200 West
Salt Lake City, Utah 84116
801-532-2043
TLX 6711664 AMAX UW

AMAX
Minerals + Energy

June 29, 1988

Dennis Oaks, Team Leader
Salt Lake District Office
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr. Oaks,

AMAX Magnesium is the largest private employer and tax payer in Tooele County. We have over 55,000 acres of solar ponds in the Stansbury basin and have just completed an additional 60,000 acre solar pond operation in the west desert north of Knolls, Utah. We currently employee over 500 employees and contribute nearly 100+ million dollars annually to the Utah economy.

AMAX has made a tremendous financial commitment to this area and is extremely concerned that the public lands which it presently occupies be managed in a manner consistent with its investment and the public good.

We have reviewed the draft P.E.R.M.P./E.I.S. and AMAX Magnesium Corporation (AMAX) would like to submit the following comments for your consideration in developing the final working plan for the Pony Express Resource Area:

3.1 1. AMAX prefers and strongly recommends the sale of parcel 10 lands to AMAX as referenced in alternative 3 in Table 2-1 and figure 2-17 (Lands Identified for Disposal). This parcel as described contains the lands covered under the AMAX Magnesium Right-of-way #U54897. We feel the sale of these lands to AMAX Magnesium would meet all the criteria of FLPMA Section 203. The sale would most importantly meet the public and economic needs of Tooele County. Sale of the parcel 10 lands to AMAX would enhance private use and further industrialization of the area in a manner consistent with current and future planned uses. We further recommend this concept be adopted in your most preferred alternative number two (2).

2. Chapter 3 page 73 makes no mention of the AMAX Magnesium Knolls Solar
Evaporation Ponds System in the Solid Leasable Minerals section. AMAX
diverts minerals to BLM lands and extracts them. Our current ROW #U54897
3.2 provides for operation of a solar ponds system which deposits minerals on
these lands which may very well be utilized by AMAX in future economic
ventures. We therefore feel AMAX should be listed as an operating entity
with rights to these solid leasable minerals. We also feel AMAX should
be listed as a major contributor to the Tooele County economy on page
3.3 110.

Response to Letter 3

3.1 In this case, public objectives as discussed in 203 of FLPMA are being met with a right-of-way instead of through land sale. Since this parcel is over 2,500 acres in size, the sale would require special Congressional approval (Section 203(c) FLPMA).

According to our proposed plan the public lands in question could be disposed of through an exchange of the criteria outlined in Proposed Lands Decision 3 were met. If an applicant offered lands in an exchange which were valuable to BLM programs, BLM could make a determination that public interest would be well served by the exchange.

3.2 Your right-of-way U-54897 gives you the right to use the surface for evaporation ponds only. Since water from the West Desert Pumping Project is being utilized for your operation, any mineral leases would be issued by the State of Utah. Your right-of-way does not give Amax the right to any Federal subsurface mineral resources (i.e. brines) without a mineral lease from BLM.

3.3 Your comment is noted. A change will be made. See Revisions and Corrections for page 110.

Comment Letter 3

3.4 3. AMAX is concerned with the open designation of its leased lands for use by off road vehicles (Reference Figure 2-12). This designation should be changed to a closed designation to protect lives and property and to avoid interference with operations at the solar evaporation ponds. Use of ORV's is not compatible with the current use of these lands.

3.5 4. AMAX is concerned about the "Category 1 - Standard Stipulations" of its leased lands and ask that you review this classification to ensure our leased lands are adequately protected. Experience and common sense tell us that mineral exploration and operation within a solar pond system would not be compatible use of the lands.

3.6 5. AMAX requests that the remainder of the AMAX ROW #U54897 lands be withdrawn along with those proposed in Figure 2-14 (Proposed Mineral Withdrawals) until such time as the BLM decides to sell the lands. The remainder of AMAX's leased lands in this area are as compatible as all other lands identified for withdrawal in this scenario. Addition of these lands would more accurately reflect the true use of the public lands for industrial development.

The draft P.E.R.M.P./E.I.S. is a very good analysis of the potential uses and subsequent effects on a vast, but fragile environment. We feel that with adoption of our suggestions and requests, that the plan will successfully meet the needs of all those interested in managing the area in a successful manner.

Sincerely,

Lee R. Brown

Lee R. Brown
Vice President
AMAX Magnesium Corporation

cc: R. Crosser
D. Delcour
J. Todd
D. Wilkinson

Response Letter 3

3.4 BLM recognized that ORV use in Tooele County has been growing steadily for the past decade. Subsequent growth trends have raised much controversy over resource impairments and use conflicts.

More detailed study on this issue needs to be performed. BLM will be conducting an ORV-Designation Planning Amendment to this RMP starting this fall. An overall plan on a county-wide basis is scheduled with opportunity for full comment and participation by users and affected parties. At that time, BLM would appreciate your comments on the issue. Final designations will provide ORV users with areas for use and eliminate serious adverse effects or safety concerns through limitations or closures of other areas.

3.5 See Decision 2 under the Fluid Minerals Program, Item 6.

3.6 BLM is charged with the responsibility to keep apprised of State and local government resource management programs, and assure that consideration is given to those state and local plans that are germane to the development of land use plans for public lands (Section 202(9) FLPMA).

Tooele County has designated the area of the proposed withdrawal as a future industrial development area. BLM will work in support of this proposed use and manage the public lands in a manner consistent with this designation.

The lands in your area of concern are currently withdrawn from mining claim location. BLM proposes to revoke part or all of that withdrawal within the next year. At this point, it does not seem necessary to keep the public lands in U-54897 withdrawn.

Comment Letter 4

[illegible]
June 29, 1988

John H. Stephenson
Bureau of Land Management
2370 S 2300 W
Salt Lake City, Utah 84119

Mr Stephenson

I appreciated the "Management Plan and Environmental Impact Statement" you sent. It was very information. Thank you.

I have been associated with the Government Creek allotment for forty eight years. The rest-rotation plan works and helps temporarily but the Juniper trees take over any way. This has happened even in all the reseeded areas.

4.1 Nothing will really help the range until the trees are removed.

Under the proper management the Government Creek allotment could be restored to its original environment of no trees and double its grazing capacity.

Sincerely
Lloyd Berry

Response to Letter 4

4.1 The multiple-use management decisions included as Appendix 1A of the Draft RMP/EIS identify 38,000 acres which have potential for land treatment. This includes 3,800 acres in the Government Creek allotment. Maintenance of existing land treatments is accomplished under BLM's range management program. The availability of funding is critical and projects are prioritized among other projects in the Resource Area.

Grazing systems included in Allotment Management Plans and Multiple-Use Management Plans assure proper use and management of the treated areas and the allotment as a whole. Proper management allows for the establishment of seeded species within the treated areas and slows the reinvasion of the less desirable plant species into the treated areas. All projects are done with multiple-use consideration to improve wildlife habitat, watershed conditions and grazing capacity.

Comment Letter 5

June 27, 1988

Bureau of Land Management
Salt Lake District Office
2370 South 2300 West
Salt Lake City, UT 84119-9908

Re: Pony Express RMP/EIS

Dear Gentlepersons:

Please accept this comment to the Pony Express RMP/EIS.

This comment is directed toward the treatment of Parcel 80 and is intended to support the recommendation of the preferred alternative with respect to that land.

Parcel 80 has a common boundary on its north side with land owned by South Shore Farms. South Shore Farms is a Utah general partnership which is engaged in raising fruit, cherries, peaches, nectarines, and apples. Parcel 80 is the northwest quarter of Section 15, Township 8 South, Range 1 East, SLM. South Shore Farms owns about 500 acres of land located in Sections 9 and 10 just to the north of Section 15.

South Shore acquired the land it owns in those sections in 1975. The South Shore land is located on the shore of Utah Lake. Much of it was included in the Strawberry Water Project and was irrigated with water delivered through Lateral 34 of the original project.

Because of difficulties in delivering water and also because of the difficulty involved in flood irrigating the land, water cease to be delivered to it in the late 1930s and early 1940s.

The comments which follow are intended to indicate the environmental changes which likely will take place if Parcel 80 i disposed of by the United States.

South Shore's land was used for the grazing of sheep until 1975. After purchasing it in 1975, South Shore Farms commenced farming in 1976. Approximately 10,000 fruit trees were planted in 1976

Comment Letter 5

Bureau of Land Management
June 27, 1988
Page 2

and planting has continued until about 400 acres have been planted with an approximate total of 65,000 trees.

When work commenced on the land in 1976, there was, other than sage brush bushes, a single willow bush on the 500 acres.

In trying to recall what bird and animal life inhabited the land at the time of its purchase, we can recall a single hen pheasant and migratory blue birds and some crows. We don't recall any other birds at the time we commenced preparing the land in the spring of 1976, though doubtlessly there were some. Neither do we remember any animals other than cotton tails and jack rabbits.

The orchards that have been planted have attracted birds in profusion. From early spring until just before the hunting season commences there are mourning doves by the hundreds. They nest in the trees and at the edges of the ground cover between the rows of trees. The hunting season is well chosen because the doves leave in the period just preceding it.

The pheasant population in the orchard varies. The last five years the ground has been covered with snow for significant periods of time. During those times hawks take a heavy toll on the pheasants and the pheasant population suffers. This year there are quite a few birds in evidence. We see marsh hawks, red tail hawks and two other varieties of hawks that I am not sure of. We see crows in the spring that nest in the cliffs above the orchard. Kestrels are present but their number vary. Western Tanagers, Bullock's orioles, fly catchers, robins, meadow larks, shrikes, woodpeckers, chuckars, swallows, night hawks, and owls are some of the birds which visit the property which were unnoticed before the orchards were planted.

Skunks are valuable animals to horticultirists. Their population varies, two years ago they were plentiful, now they are scarce. We see blow snakes fairly frequently and occasionally see rattlesnakes. The skunks and snakes eat mice. Mice are enemies of horticultirists. Over the past few years we have seen several desert foxes. Until recently a badger lived on the land, he has moved to neighboring land.

We believe that our farming activities have contributed to increases in almost all of the above birds and animals except perhaps for the rattlesnakes. We have been unable to convince our employees of the value of rattlesnakes to the orchard operation.

Parcel 80 was used for grazing sheep in the past. Very little of the native grasses are left. Some tufts appear under clumps of

Comment Letter 5

Bureau of Land Management
June 27, 1988
Page 3

sagebrush. Except where the soil has been protected by sagebrush, the top inch or two inches of loamy top soil has been eroded. Except where protected by sagebrush, the exposed top soil consists mostly of a fine pebbly gravel or in some instances, of an exposed barren clay soil.

Where we farm, we irrigate with either drip irrigation devices, spitters or mini-sprinklers. The way we irrigate taken together with the method which we use to plant trees has almost totally prevented erosion from water.

In order to plant trees with a mechanical tree planter, we have found it necessary to rip the soil with a ripper attached to a tractor. Our rows of trees are, as much as possible, planted at right angles to the slope of the land. Our rows are either 16 or 18 feet apart. Thus, in a heavy storm or when snow melts rapidly, the flow of water is interrupted each 16 or 18 feet and the water is caught in the depression caused by the ripping of the soil. The result is that the water moves laterally in the depression and rarely crosses the open area between rows of trees.

Horticultirists need a ground cover between rows of trees. Ground cover is encouraged by the irrigation of the trees. We have observed that, while it is a slow process, the native grasses and plants are returning as ground cover between the rows. This is particularly true of a little plant called filaree. Filaree spreads fairly rapidly now that it is not grazed by sheep. It is a favorite food of sheep, high in protein.

As one would expect, there are considerations which would favor retention of ownership of Parcel 80. One consideration would be the use made of the land by the public.

South Shore representatives are present on South Shore land every week of the year. We observe activities in the vicinity of our orchards and we have particularly observed the activities which take place on parcel 80.

We believe that the annual utilization of parcel 80 by members of the public would be measured in hours rather than days or weeks.

We observe a few people on that land on the opening of the hunting season for pheasants. The hunters do not stay long, the birds run through the sage brush, they don't fly and the hunters quickly realize the futility of hunting there. We doubt that pheasant hunters spend a total of 12 hours on that land during the hunting season. We have seen an occasional rabbit hunter. We have not observed other uses being made of the land.

Comment Letter 5

Bureau of Land Management
June 27, 1988
Page 4

In addition to what we perceive as being environmental benefits we believe that there are economic benefits to be gained by the disposal of Parcel 80 by the United States.

The past 12 years have demonstrated that the climatic effect of Utah Lake is beneficial to the surrounding lands as orchard sites. In 12 years, South Shore Farms has not experienced a spring freeze. We doubt that Parcel 80 will be quite as beneficially affected as the land closer to the water. Also greater elevation increases the cost of pumping water to it. Still we believe that it is attractive for use in growing cherries, peaches and apples.

If the preferred alternative is adopted and if South Shore Farms acquires the land, it will be planted into orchard commencing in 1989. The preparation and planting and subsequent cultivation will afford a good deal of employment and will occasion a considerable capital investment.

South Shore Farms presently irrigates the land that it owns in Sections 9 and 10 by pumping from Utah Lake. The water rights are represented by shares of stock in South Jordan, East Jordan and Utah & Salt Lake Canal Company. Sufficient shares of stock are now owned so as to enable South Shore Farms to irrigate those additional acres.

5.1 If Parcel 80 should become available for purchase and if the price were reasonable, South Shore Farms would be willing to purchase the land for cash. We believe that most of the 160 acres could be planted to fruit. That much acreage could make a significant contribution to the fruit production of the State of Utah and would significantly benefit the Utah County economy.

South Shore Farms has a pending application for Parcel 80 under the Desert Land Act. We feel that we are entitled to receive title to the land under our pending application. We are willing to acquire the land by purchase if the price is reasonable rather than dispute with the United States concerning our rights under our existing application.

We have and will continue to appreciate the courtesies extended to us by the BLM staff and will observe the events affecting the RMP/EIS with interest.

Sincerely,

Robert W. McMullin
South Shore Farms

Response to Letter 5

5.1 BLM has identified minimal public value associated with Tract 80. We agree that the use proposed in your letter would be in the public interest because of its economic return.

Comment Letter 6

Utah Petroleum Association
A Division of Rocky Mountain Oil & Gas Association
56 EAST 300 SOUTH, SUITE 200/SALT LAKE CITY, UTAH 84111-2202/PHONE (801) 363-5757

PRESIDENT
GARY K. FISHER
Chevron U.S.A., Inc.

EXECUTIVE DIRECTOR
JIM PEACOCK

July 21, 1988

Mr. Dennis Oaks
Team Leader
Salt Lake District Office
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr. Oaks:

I am writing on behalf of the Utah Petroleum Association, which is a state division of the Rocky Mountain Oil and Gas Association (RMOGA). RMOGA is an oil and gas trade association whose members account for 90% of the exploration and production of oil and gas in the eight western states it services.

We appreciate the opportunity to comment on the Draft Environmental Impact Statement and Resource Management Plan for the Pony Express Resource Area in northwest Utah. While we believe the plan does not pose a serious threat to future oil and gas activities, there are several flaws or deficiencies in the draft plan which must be rectified in the final document.

6.1 First, the planning document does not comply with the direction contained in Section 1424 of the Supplemental Planning Guidance for Energy and Mineral Resources, particularly the fluid mineral leasing direction. In addition to identifying lease stipulations and areas where the stipulations would be applied, the plan must also assess the potential for fluid mineral occurrence using the procedures and classification system described in BLM Manual 3031. Furthermore, the results of the assessment of fluid mineral potential should be displayed in the table displayed in Appendix 1 of the Supplemental Guidance. The Pony Express Draft RMP/EIS does not comply with this directive.

6.2 In addition, the Data Elements of the Fluid Mineral Leasing Supplemental Guidance requires the planning staff to include a discussion of "Data concerning the availability and effectiveness of measures for mitigating adverse impacts on other resource values and/or land uses". The identification of mitigation measures utilized or available to protect other resource values during oil and gas operations is of critical importance in a land use planning document. This information is particularly important in light of the fact that the BLM included a description of certain resources, such as cultural values, wildlife, watershed, visual quality, to name a few, which could be adversely affected

Response to Letter 6

6.1 Oil and gas potential was included in the Management Situation Analysis, the document which provides a summary of background data and current conditions. It was not included in the Draft RMP/EIS. Page 73 has been changed to reflect oil and gas potential (see Revisions and Corrections for page 73). The table on page 121 has also been modified to reflect your concerns (see Revisions and Corrections for pages 121 and 122.)

6.2 Refer to Proposed Mineral Decision 2 in this document, to see what types of situations would allow modification to the oil and gas stipulations.

Comment Letter 6

by oil and gas activities. The only way to present a true depiction of how these resources may be impacted by oil and gas activities is to discuss mitigation measures available to help protect such values.

6.3 In order to adequately describe mitigation measures utilized during oil and gas activities, it is necessary to assess the levels of activities which could occur. Since it is impossible to predict what the future may hold in terms of oil and gas operations since there has been very little activity to date, we recommend that the BLM include a generic discussion on the phases of oil and gas activities. An examination of reasonable mitigation measures should be included for each phase of operations.

6.4 We object to the BLM's lack of sufficient justification for the designation of the North Stansbury Mountains and North Deep Creek Mountains Areas of Critical Environmental Concern (ACEC). The plan states that these areas will be designated ACECs only if Congress fails to designate them wilderness. The BLM Manual, Section 1617, ACEC Identification, Evaluation and Designation Guidance, states that while there is no size limitation for an ACEC, it should be held to the minimum area necessary to protect life and safety or the resources on which the designation is based. It also states that the ACEC designation is not intended to blanket large areas with specific restrictive stipulations and that it is also not to be used as a substitute for a suitability recommendation for a wilderness study area. Therefore, we oppose the BLM's proposal to designate these areas ACECs because sufficient justification for these designations has not been presented in the planning document.

6.5 Another item of concern is that the ACEC Guidelines also direct that the status of any involved mining claims or Pre-FLPMA leases which could affect opportunities to assure adequate protection or management must be analyzed. None of this information is contained in the plan other than the statement that the entire Resource Area is under oil and gas lease. This statement implies that the two proposed ACECs are currently under lease which could pose a serious management conflict if a lessee decided to exercise his lease rights. The mineral potential of these areas must also be analyzed and discussed in the plan along with the trade-offs between an ACEC designation and foregone mineral opportunities in accordance with this guidance.

Response to Letter 6

6.3 Your comment is noted. See Revisions and Corrections for page 113.

6.4 Natural and cultural resources contained within the North Stansbury and Deep Creek Mountains contain special worth, meaning and distinctiveness. Appendix 8 in the Draft RMP/EIS states that the Deep Creek Mountains are of unique character when compared to all other mountain ranges in the region. The sensitive resources referred to are further described in Appendix 2 in the Draft RMP/EIS. The same two appendices make reference to the special resources of the North Stansbury Mountains.

The acreage proposed for designation encompasses the important resources identified for protection in each range. The 38,260 acres proposed between these two areas comprise under 2 percent of the public land of the PERA. Also notice in Appendix 8 that thousands of acres of other lands with special resources were considered, but they failed to meet the importance and relevance criteria and were dismissed as potential areas for ACEC designation.

Specific restrictive stipulations are not intended. As listed in BLM Manual 1617 under Basic Concepts of ACEC Designation, activities in these areas should be compatible with multiple-use management, but they must complement the primary objective of the ACEC. It is true that ACEC designation is not intended to be used as a substitute for a wilderness suitability recommendation. Portions of both WSAs are recommended as suitable for wilderness designation in the Draft Statewide Wilderness EIS. Whether protection is provided to the unique resources of these two areas through wilderness or ACEC designation or both, it is BLM's objective to manage them under wise principles of conservation in the best interest of all users.

6.5 See Comment 22.19.

There are no oil and gas leases in either the North Stansbury or North Deep Creek proposed ACECs. The mineral potential of both areas has been analyzed in the Utah Wilderness EIS (forthcoming) and both have been found to have low potential for any oil and gas deposits.

Comment Letter 6

In conclusion, while we can support the general management philosophy displayed in the Preferred Alternative, we are unable to support the ACEC proposals. Furthermore, we believe it is imperative that the BLM incorporate the Changes we have recommended for inclusion in the final plan. These modifications are critically important if the BLM is to have a legal, defensible planning document.

Sincerely,

Jim Peacock

Jim Peacock
Executive Director

JP:ba

Comment Letter 7

United States Department of the Interior
FISH AND WILDLIFE SERVICE
FISH AND WILDLIFE ENHANCEMENT
UTAH STATE OFFICE
2078 ADMINISTRATION BUILDING
1745 WEST 1700 SOUTH
SALT LAKE CITY, UTAH 84104-5110

TAKE PRIDE IN AMERICA

In Reply Refer To
(FWE)

July 22, 1988

TO: District Manager, Salt Lake District, Bureau of Land Management, Salt Lake City, Utah

FROM: State Supervisor, Fish and Wildlife Enhancement, U.S. Fish and Wildlife Service,Salt Lake City, Utah

Subject: Draft Pony Express Resource Management Plan and Environmental Impact Statement

Our office has reviewed the draft Pony Express Resource Management Plan (Plan) and is providing the following comments:

Pages 3-6 , Environmental Consequences

7.1 Alternatives 1 through 3 would dispose of various amounts of historical sage grouse strutting habitat. Sage grouse numbers in the State of Utah have been declining in recent years due to conversion of range land to agriculture. The further loss of critical strutting areas would only exacerbate the problem. This appears to be in conflict with the statement on page 48 and on page 100 that disposal of breeding complexes would conflict with sage grouse populations and that the Bureau of Land Management will improve crucial strutting habitat for the species. A statement on page 196 notes only five active strutting grounds are found in the Pony Express Resource Area one entirely on National Forest land and two almost entirely on the Richfield District.

Page 16, Table 1-2, U.S. Fish and Wildlife Service

7.2 The Animal Damage Control program is no longer under the auspices of the U.S. Fish and Wildlife Service (Service). It has been transferred to the Animal and Plant Health Inspection Service, U.S. Department of Agriculture.

Due to the general nature of the Plan, the Service will not issue a biological opinion on it. When specific actions are contemplated by the Bureau that would cause a "may effect" situation for any listed species, the Bureau should then initiate Section 7 consultation with this office. An example of such an action would be the disposal of public land in bald eagle high use areas, or within 10 miles of a peregrine falcon nest site.

Page 41, first paragraph, last two sentences, Lands Actions

Response to Letter 7

7.1 In the preferred alternative and the Proposed Plan as found in this document, BLM will not dispose of any current or historical sage grouse strutting habitat in the Resource Area except for Tract 35, which contains an abandoned lek. This tract is currently under Desert Land Entry application and has already been classified as suitable for such use.

7.2 The correction has been made. See Revisions and Corrections for page 16. When specific actions proposed for the public land result in a "may effect" determination for any listed species, BLM will initiate a Section 7 consultation with the USFWS.

Comment Letter 7

7.3 With the issuance of a Federal permit for the FIREX 88 exercise to the National Guard which allowed use of hazardous materials (munitions, fuels, chemicals etc.), live artillery firing, and use of tracked vehicles on public land, these two sentences are no longer correct.

7.4 Page 48, 2nd column, Wildlife and Fisheries Program

The phrase historic eyres should be changed to historical eyries. All peregrine eyries are historical in character, not historic.

7.5 Page 101, Fisheries

The statement that no streams in Tooele County support populations of fish is incorrect. At least 10 streams are known to have fish in them.

7.6 Page 101, Threatened, Endangered, and Sensitive Wildlife Species

The last paragraph on that page appears to have some missing lines.

7.7 Page 126, Alternative 2, Impacts on Wildlife

The Service is opposed to the disposal of tract 84. This tract should be retained in Federal ownership to protect the wetland values associated with it. Utah has experienced a dramatic decline in wetlands and all remaining areas should receive full protection.

7.8 Page 190 - ACEC Evaluation Process

Bald Eagles

It is incorrectly stated that the bald eagle population is dispersed throughout Tooele County. Bald eagles are concentrated in the eastern part of the county in Rush and Skull valleys. It is also incorrect to state that all known heavy-use areas are on private land. Several mountain roost sites, which are very important for this population, have substantial amounts of public land. As noted on page 101, several critical roost areas occur in the Oquirrh, Tintic, Sheeprock and Stansbury mountains.

Peregrine falcon

7.9 The statements that public lands are only marginally involved in the hunting range associated with peregrine occupancy of Timpie Springs and that public lands have no bearing on the success or failure to establish peregrines at that site are both incorrect. Peregrine falcon hunting habitat is defined as those areas within 10 miles of the nest site which supply the major portion of the food source. Other habitats within 10 to 20 miles of the nest site also may be important hunting areas, but they are often so interspersed or widespread that it is difficult to specifically delineate them. Section 1221 of the Rocky Mountain Peregrine Falcon Recovery Plan states that land-use

Response to Letter 7

7.3 The proposed decision for military activities (see Lands Proposed Decision 4) has been changed to delete the reference to the use of tracked vehicles on public land. The approval of tracked vehicle use will be made on a case-by-case basis and must be consistent with the off-road vehicle designations.

The Utah National Guard did not use hazardous materials or live artillery firing on public land for its Firex exercise. Proposed Decision 4 reflects BLM's intent to prohibit these uses for future military activities.

7.4 The change has been made. See Revisions and Corrections for page 48.

7.5 See Comment Response 22.28.

7.6 The change has been made. See Revisions and Corrections for page 101.

7.7 Tract 84 was inadvertently placed on the disposal map and has not been identified in any portion of Alternative 2 or the Proposed Plan for disposal. See Figure 1 in this document.

7.8 The changes have been made. See Revisions and Corrections for page 190.

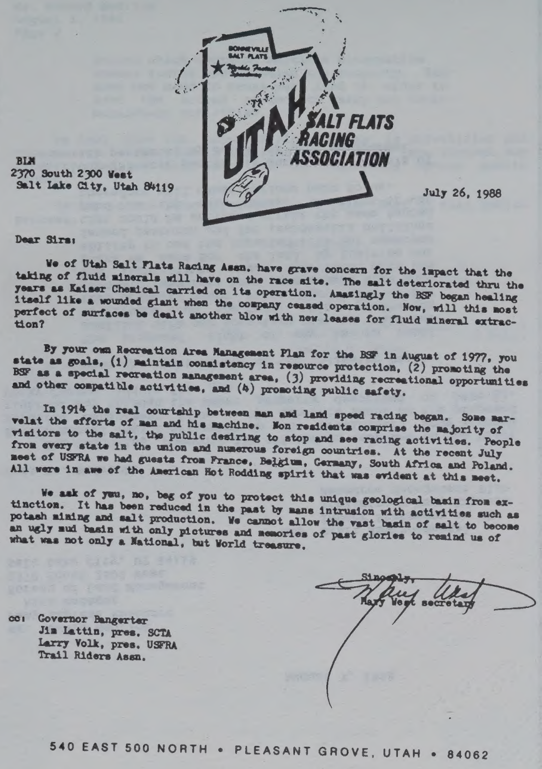
7.9 The Draft RMP/EIS confused Timpe Springs and Blue Lake. Both areas have been identified for present and potential peregrine hack tower sites. At Blue Lake there is little public land on the Salt Lake District side that would be involved with this reintroduction and subsequent hunting ranges. The change has been made as shown in Revisions and Corrections for page 190.

Comment Letter 7

practices and development which adversely alter or eliminate the character of the hunting habitat or prey base within 10 miles and immediate habitats within 1 mile of the nesting site should be discouraged. Substantial amounts of public land would fall within this area.

Robert A. Ruesink

Comment Letter 8



BONNEVILLE SALT FLATS
World's Fastest Speedway
UTAH SALT FLATS RACING ASSOCIATION

BLM
2370 South 2300 West
Salt Lake City, Utah 84119

July 26, 1988

Dear Sirs:

8.1 We of Utah Salt Flats Racing Assn. have grave concern for the impact that the taking of fluid minerals will have on the race site. The salt deteriorated thru the years as Kaiser Chemical carried on its operation. Amazingly the BSF began healing itself like a wounded giant when the company ceased operation. Now, will this most perfect of surfaces be dealt another blow with new leases for fluid mineral extraction?

By your own Recreation Area Management Plan for the BSF in August of 1977, you state as goals, (1) maintain consistency in resource protection, (2) promoting the BSF as a special recreation management area, (3) providing recreational opportunities and other compatible activities, and (4) promoting public safety.

In 1914 the real courtship between man and land speed racing began. Some marvelat the efforts of man and his machine. Non residents comprise the majority of visitors to the salt, the public desiring to stop and see racing activities. People from every state in the union and numerous foreign countries. At the recent July meet of USFRA we had guests from France, Belgium, Germany, South Africa and Poland. All were in awe of the American Hot Rodding spirit that was evident at this meet.

We ask of you, no, beg of you to protect this unique geological basin from extinction. It has been reduced in the past by mans intrusion with activities such as potash mining and salt production. We cannot allow the vast basin of salt to become an ugly mud basin with only pictures and memories of past glories to remind us of what was not only a National, but World treasure.

Sincerely,

Mary West

Mary West secretary

cc: Governor Bangerter
Jim Lattin, pres. SCTA
Larry Volk, pres. USFRA
Trail Riders Assn.

540 EAST 500 NORTH • PLEASANT GROVE, UTAH • 84062

Response to Letter 8

8.1 Under the preferred alternative and the Proposed Plan, the Bonneville Salt Flats ACEC falls under category 3 (No Surface Occupancy) for fluid minerals. Fluid minerals include oil and gas, and geothermal resources. This stipulation is sufficient protection for the Bonneville Salt Flats as it relates to fluid mineral leasing.

This comment refers to fluid mineral leasing but actually addresses leasing for extraction of brines. Under the Proposed Plan, the Bonneville Salt Flats would continue to be closed for further leasing of such minerals. BLM will do everything possible to maintain and protect the BSF.

Comment Letter 9

August 3, 1988

Mr. Howard Hedrick
Pony Express Resource
Area Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, UT 84119

RE: Draft Environmental Impact Statement on the Preliminary Pony Express Resource Management Plan

Dear Mr. Hedrick:

The following comments are offered in response to the Draft Environmental Impact Statement on the preliminary Pony Express Resource Management Plan. The comments focus on the proposed right-of-way through the Weber property described on page 53, Rocky Canyon, and in fig. 2-8.

We oppose the right-of-way on the following basis:

9.1
- The proposed right of way is in total conflict with our long-term plan to earn our livelihood from the farm. Since purchasing this property eight years ago, all of our economic resources have gone toward this end. The right-of-way would interfere with the plans we have for the land by limiting our ability to use the impacted area for numerous fenced pasturns and for residential buildings that could be enclosed within the same fenced yard as the main house. The right-of-way therefore will cause serious harm to us.

9.2
- Our 295 acre parcel is surrounded on 87% of its perimeter by Bureau of Land Management

Response to Letter 9

9.1 The Draft RMP/EIS and Proposed Plan contain a preliminary identification of legal access routes including the route into the Rocky Canyon area. Before an easement into each area is obtained, BLM will complete a route analysis to determine whether an acceptable route across public land is available. If an acceptable route across public land is available, access across private land will not be acquired.

9.2 See Response 9.1.

Comment Letter 9

Mr. Howard Hedrick
August 3, 1988
Page 2

ground which contains multiple alternative access routes surrounding the property. BLM does not need to cross our land in order to have the access needed to carry out their management activities.

We feel that the proposed right-of-way is unjustified and unnecessary. The road in question is a private lane through our property and we will continue to vigorously oppose public access.

We appreciate the opportunity to take part in this public process.

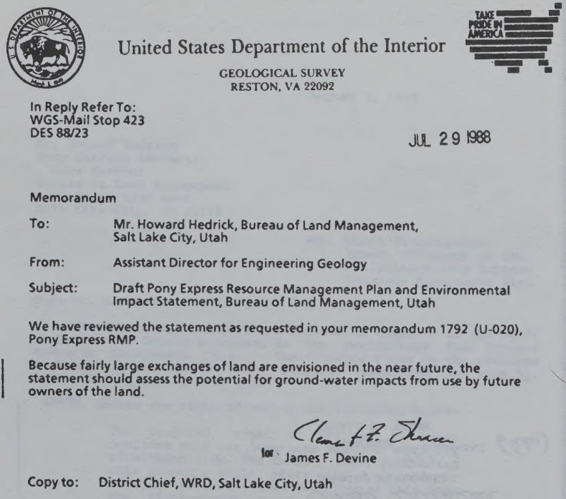
Sincerely,

Dorothy Wiskowski
Dorothy Wiskowski

Ronald H. Weber (Dw)
Ronald H. Weber

DW/ew

Comment Letter 10



United States Department of the Interior
GEOLOGICAL SURVEY
RESTON, VA 22092

In Reply Refer To:
WGS-Mail Stop 423
DES 88/23

JUL 29 1988

Memorandum

To: Mr. Howard Hedrick, Bureau of Land Management, Salt Lake City, Utah

From: Assistant Director for Engineering Geology

Subject: Draft Pony Express Resource Management Plan and Environmental Impact Statement, Bureau of Land Management, Utah

We have reviewed the statement as requested in your memorandum 1792 (U-020), Pony Express RMP.

10.1 Because fairly large exchanges of land are envisioned in the near future, the statement should assess the potential for ground-water impacts from use by future owners of the land.

for James F. Devine

Copy to: District Chief, WRD, Salt Lake City, Utah

Response to Letter 10

10.1 The potential for groundwater impacts from land exchanges is difficult to analyze because of the number of uses that future owners might have for the acquired land. Such uses could include but are not limited to agriculture, housing, community development and industry. Each of these uses has different requirements for groundwater and/or potential for impact to groundwater. Issues concerning both the use of groundwater via pumping and other impacts to groundwater are monitored by the Utah Department of Water Resources and the Utah Department of Health's Division of Environmental Health, respectively. More site-specific information and assessment of potential impacts will be analyzed in environmental assessments prior to the land exchanges.

Comment Letter 11

State of Utah
DEPARTMENT OF HEALTH
DIVISION OF ENVIRONMENTAL HEALTH

Norman H. Bangerter
Governor
Suzanne Dandoy, M.D., M.P.H.
Executive Director
Kenneth L. Alkema
Director

Bureau of Water Pollution Control
288 North 1460 West, P.O. Box 16690
Salt Lake City, Utah 84116-0690
(801) 538-6146

August 3, 1988

Mr. Howard Hedrick
Pony Express Resource Area Manager
Bureau of Land Management
2370 South 2300 West
Salt lake City, Utah 84119

Dear Mr. Hedrick:

The Utah Bureau of Water Pollution has reviewed the Draft Pony Express Resource Management Plan. We support the preferred alternative which provides for the development of resources while protecting or enhancing environmental values.

11.1 We recommend that water quality monitoring stations which are not located at either existing STORET or WATSTORE sites be assigned a STORET number. We will assist BLM in assigning STORET numbers to water quality monitoring stations. This process will help expand the existing water quality data base and will allow the data to be accessible to interested agencies or individuals.

11.2 When best management practices (BMP's) are used to minimize pollution of water quality from construction or recreation activities, we recommend that they be monitored for their effectiveness. The monitoring of BMP effectiveness will provide valuable information when BMP's are being considered for similar situations in other areas.

We appreciate the opportunity to comment on this management plan and wish to compliment BLM on their efforts in its preparation.

Sincerely,

for Michael K Reichert
Don A. Ostler, P.E., Director
Bureau of Water Pollution Control

RDG/dgm

3981-10

Response to Letter 11

11.1 BLM agrees that entering water quality monitoring stations into these programs would be a benefit to this agency and other users. With your assistance, BLM will adopt this recommendation as stations are established.

11.2 Monitoring BMPs for effectiveness will help minimize water pollution from future projects or activities. BLM will monitor the effectiveness of BMPs to the extent that funding and manpower are available.

Comment Letter 12

FB.
Utah Farm Bureau Federation
5300 SOUTH 360 WEST, SALT LAKE CITY, UTAH 84123

August 4, 1988

Mr. Howard Hedrick
Pony Express Resource Area Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr. Hedrick:

Serving as Utah's largest general farm and ranch organization, representing nearly 21,000 member families, we present this statement in response to your agency's Draft Pony Express Resource Management Plan and Environmental Impact Statement.

Generally speaking, your agency has done a commendable job of proposing a management plan that attempts to maintain multiple use opportunities for both public and private interests. With 77% of its acreage owned or controlled by federal or state government (of which 32% is BLM), this planning area's economic future will no doubt be significantly impacted by the final decisions stemming from your draft.

We recognize this draft addresses various major interests such as mineral exploration and recreation activity. These respective industries clearly serve as major sources of revenue for county tax bases which subsequently provide for quality education opportunities and other public services. However, because of our strong commitment to Utah's most basic industry--agriculture--the comments we offer here are generally related to domestic livestock grazing. We trust that the concerns of these other industries mentioned above will be addressed by respective individuals and/or organizations.

From a quantitative standpoint, the preferred alternative's negative impact on
domestic livestock grazing is negligible, as the draft points out. We can
support the loss of 428 AUM's against the overall planning area's 108,868
12.1 AUM's providing the elimination of such AUM's is acceptable to the livestock
operators associated with them. Qualitatively, however, the draft does tend
to suggest that proposed wildlife management objectives have the potential of
imposing future problems (and in some cases have) for various livestock
operations. We are concerned that in the long run, further reductions in
domestic livestock AUM's could result. For instance, the recent expansion of
12.2 antelope numbers by 150 in Rush Valley has created undue pressure on livestock
operators in that area. This is not only a problem because of the increased
competition it has created for public land forage, but also due to the heavy
burdens it has placed on private lands in the vicinity of these transplants.

12.3 This argument is further substantiated by the fact that suitability of the
present plant community composition of the area has not been determined for

Response to Letter 12

12.1 The loss of 428 AUMs indicated in the RMP should be 384 AUMs (see Revisions and Corrections for page 127). While the overall impact is negligible, BLM is aware that the impact on individual operators will be greater. BLM has made careful consideration of each disposal tract affecting livestock use in an attempt to minimize the adverse impacts. Coordination with operators has taken place and will continue in an attempt to obtain agreement on these livestock use changes.

Some adverse decisions may be needed to improve land management, comply with existing Bureau of Reclamation withdrawals, and implement other lands related actions. Impacts to individuals will be considered closely prior to final decisions.

12-2 Forage allocations and/or maximum numbers are included in BLM's decisions to reintroduce big game wildlife into new areas. In Tooele County, bighorn sheep are limited to 205 animals or 298 AUMs (see page 45 of the Draft RMP/EIS) and antelope to 150 animals (see page 46 of the Draft RMP/EIS). Present information indicates that the reintroduction of bighorn and antelope would be compatible with the existing levels of livestock use.

BLM is currently unaware of any pressure the antelope in the Rush Valley area have caused on livestock use.

The antelope reintroduction was intentionally done in an area away from private crop and pasture land to avoid depradation problems. If such problems occur UDWR has agreed to resolve them with the private landowner.

If future conflicts occur with either of these reintroductions, study of the specific problems would determine the proper action. Changes to the maximum numbers of reintroduced animals could occur only after an environmental assessment of the increase or decrease was prepared and an amendment to the RMP was completed. This would also be the case for any future reintroductions in Utah County.

12.3 It is correct that suitability of present plant composition has not been determined in the Riverbed and Snake Valley portions of the West Desert antelope herd unit or the Puddle Valley herd unit; however, at this time the BLM is unaware of any pressure antelope have made on livestock use.

Comment Letter 12

antelope populations. According to page 99 of the draft, suitability of present plant composition has also not been determined in the Riverbed and Snake Valley portions of the West Desert Antelope herd unit nor the Puddle Valley herd unit where 70 and 72 antelope were transplanted in 1975 and 1979, respectively.

12.4 Moreover, we suggest that any considerations of further expansion of elk numbers in the Heaston elk herd unit 4 also include agreements with private land owners associated with this area and not just BLM, UDWR, and the Forest Service as page 99 of the draft points out.

12.5 The recent introduction of elk onto the Goshute Indian Reservation is another concern we have. Where forage allocation has not been assessed in the Deep Creek Mountains for elk, as page 47 in the draft recognizes, migratory expansion of this herd will undoubtedly create problems for livestock permittees. We strongly urge BLM to commit to help mitigate this potential problem.

12.6 The reintroduction of bighorn sheep into the Deep Creek and Stansbury Mountains is an issue to which the draft does not give clear direction. In one stroke the draft stresses that big game use would be managed at current levels. In another stroke, however, the draft lends its support to the expansion of bighorn sheep numbers from 16 to 85 in the Deep Creek Mountains and from 0 to 120 animals in the Stansbury Mountains. Page 45 points out that bighorn and livestock forage appear to be noncompetetive here. And yet page 48 points out that grazing use could be changed to allow for reduced conflict of livestock class and wildlife since disease transmission potential is high. It appears that the resolution of this conflict would take place strictly at the expense of domestic livestock producers which we strongly oppose.

12.7 We support your management objectives as outlined in the Tooele Management Framework Plan to continue to work towards the limiting of wild horse numbers to 85 and 45 animals in the Cedar Mountain and Onaqui Mountain herd units, respectively. However, reports have come to us that private landowners associated with the Onaqui Mountain herd have experienced growing conflicts in this regard.

12.8 With the exception of the Bonneville Salt Flat ACEC, the BLM's preferred alternative appears to be the only one of the four alternatives that supports the inclusion of 3 additional ACEC's to the planning unit. Our experience with interpretive management of proposed ACEC's has not been favorable in other parts of the state. We have reservations about these three ACEC's from the standpoint that various restrictive management schemes could preclude long term domestic livestock grazing interests in these areas. We therefore oppose designation of any additional ACEC's to the planning area.

12.9 Current Farm Bureau Policy supports disposal of Federal lands providing 1) Due regard is given to traditional rights of use and 2) Dominant economic users have first right of refusal. We support your proposal to dispose of 50 tracts totalling 9,088 acres of lands under BLM's jurisdiction in Tooele and Utah counties, so long as it is consistent with such policy. In light of BLM's proposal of gaining legal access to 12 sites in Tooele and Utah counties, we support such action only if it meets approval by various landowners affected

Response to Letter 12

12.4 Please note on page 47 of the Draft Pony Express RMP through the EA and HMP process, part (2), the reintroduction process requires that UDWR seek agreement with adjoining landowners.

12.5 BLM has not approved elk use of public land forage in the Deep Creek Mountains. Before any such use could be approved, a plan amendment for the RMP would be required. BLM will observe the herd to determine whether conflicts occur and how the conflicts should be resolved.

12.6 The resolution of wildlife/livestock conflicts does not always result at the expense of domestic livestock producers. Change of livestock kind requires BLM to work with the permittee to make this type of change. BLM recognizes a potential disease problem in establishing bighorn sheep in the Stansbury Mountains due to the proximity to BLM domestic sheep allotments. The extent of this conflict and possible solutions will be studied more closely by UDWR before the transplant is made.

Also see Response 12.2.

12.7 We acknowledge that conflicts can occur between private landowners and wild horse herds. Wild horse counts continue to be made each year to determine herd numbers, reproduction levels and locations of the herds. When these counts show numbers above the 85 and 45 animal limits, excess animals will be removed as funding becomes available to minimize conflicts. Wild horses were removed from both herd units for this reason during the summer of 1987.

12.8 The designation of the three ACECs in the preferred alternative and the Proposed Plan is not anticipated to affect livestock grazing. For this reason, livestock forage allocations have been maintained at current levels on these areas. Your opposition is noted.

12.9 One of the requirements of BLM's evaluation of proposed land sales is the identification of the present and past uses of the land. This is done for the purpose of determining the method of sale, i.e. competitive, modified competitive, or direct. Modified competitive and direct sale methods are used when necessary to protect existing equities in the land. Depending on the circumstances, BLM may allow a preference to existing users (FLPMA, Section 203(f)).

The acquisition of legal access across private property is done through negotiations with the landowners and pursuant to PL 91-646 Uniform Relocation Assistance and Land Acquisition Policies Act of 1970 which requires just compensation to landowners.

Comment Letter 12

and property owners are justly compensated.

12.10 As you know, the average actual use of AUM's by livestock permittees in your district has often been below that of active preference. Indeed this suggests a general conservative attitude in the 137 permittees using this area. We hope as allotment management plans are developed in the future under the final version of this plan, that BLM will continue to recognize this character, in spite of ever-increasing pressures from anti-livestock groups.

We appreciate this opportunity to comment, and respectfully request your favorable consideration for the concerns we have addressed. We further pledge our support to assist you in sustaining proven multiple use principles as we cooperatively manage these valuable, renewable, range resources.

Sincerely,

Kim S Christy for

C. Booth Wallentine
Executive Vice President
and Chief Administrative Officer

cc Representative Jim Hansen
Representative Howard Nielson
Commissioner Leland Hogan

bcc Bill Hogan
Robert McMullin
Tom Bingham
Wayne Urie
Vic Saunders
Reed Balls
Kim Christy

Response to Letter 12

12.10 Applications for nonuse will continue to be approved upon the discretion of the area manager. Nonuse can be approved due to annual fluctuations in livestock operations, financial or other reasons beyond the operator's control, livestock disease or quarantine, for the conservation and protection of public lands. Other nonuse applications may be denied or allocated for the use of other livestock operators. Repeated nonuse applications may result in cancellation of permits.

Comment Letter 13

Provo Aug 4, 83

Land Managment;

Dear Sirs,

We are a retired Couple ages 73 and 82. Were not able to travel both healthwise & Financia so our only recreation is to take our trailer and go in the Mts around us.

13.1 It is wrong to take our Camping areas and make them into Wilderness, we have plenty of that. There is so many like us that depend on these Camping areas.

We belong to a trailer Club & to the Timpanogas Gem & Mineral Club. we feel that We already have to much unaccessable Mt. Country Thanks for your attention

Respectfully Mr & Mrs.
B. N. Allen 4925 No Cyn Rd
Provo Utah 84604

Response to Letter 13

13.1 This Draft Pony Express RMP and EIS do not address the issue of wilderness designations. The document includes information about three wilderness study areas currently being managed under BLM's "Interim Management Policy and Guidelines for Lands under Wilderness Review." Recommendations on whether these three WSAs are suitable for wilderness designation are contained in the Draft Statewide Wilderness EIS. Wilderness designations are made by Congress. The RMP does not recommend areas for designation.

Camping by vehicle may continue inside the WSAs in the same manner and degree that has previously occurred as long as wilderness character is not altered. It is highly unlikely that any areas which could be used by camp trailers would be included in wilderness areas.

Comment Letter 14

REILLY
WENDOVER
BOX 580, WENDOVER, UTAH 84083—801/665-2241 OR 359-0661

August 9, 1988

Mr. Howard Hedrick
Pony Express Resource Area Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, UT 84119

Re: Comments--Draft Pony Express Resource Management Plan and Environmental Impact Statement

Dear Mr. Hedrick:

This letter contains the comments of Reilly Tar & Chemical Corporation and its operating division, Reilly-Wendover ("Reilly"), in connection with the Draft Pony Express Resource Management Plan and Environmental Impact Statement ("RMP") published by the Salt Lake District of the Bureau of Land Management ("BLM") in May 1988.

First, may we express our appreciation for the cooperation we have received from the BLM in connection with the RMP. The BLM personnel at the public meeting were most helpful in responding to our questions. We have also had successful discussions since that meeting with respect to specific issues regarding the content of the RMP. We appreciate the work involved in the preparation of the RMP. We also appreciate the willingness of the BLM to consider the input from the various competing interests as the agency is involved in the resource management process.

As you may be aware, in April, 1988 Reilly acquired substantially all of the assets of Kaiser Aluminum and Chemical Corporation in connection with the potash operations near Wendover, Utah. However, you might be interested to know that Reilly has for more than 60 years been active in the State of Utah with a plant in Utah County.

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We at Reilly are proud of the contribution we make to the economy of Tooele County and the State of Utah. At the present time, Reilly has approximately 50 employees at the Wendover operation with an annual payroll of about $1,400,000.00. In addition the Utah County operation employs about 25 with a payroll of about $600,000.00.

Reilly has chosen to comment on the RMP because Reilly has a significant interest in the future development of the mineral resources of the Bonneville Salt Flats and surrounding area. Reilly agrees with the stated BLM policy of continuing to "foster and encourage . . . the orderly and economic development of domestic mineral resources." (RMP page 15.) Reilly also firmly believes in the continuing importance of the multiple use concepts in connection with the management of BLM resources.

Reilly's Operation

Before providing comments on the RMP itself, it might be helpful to the BLM personnel to understand the importance of Reilly's operation to the economic development of Utah and surrounding states. In the Reilly operation at Wendover brine from a shallow aquifer is collected in a 125 mile network of ditches extending over most of the 58,000 acres of owned and 30,000 acres of leased lands. Ditch spacing is designed to balance the annual extraction rate with the annual rainfall recharge. Brine from the collection ditch system flows to a primary pumping station where it is transferred to primary evaporation ponds comprising 8,500 acres.

Typical brine analysis at the pumping station is 1.0% potassium chloride (KCl), 1.2% magnesium chloride ($MgCl_2$) and 23.0% sodium chloride (NaCl). When the brine reaches a concentration of approximately 7.0% KCl, it is transferred to additional ponding, where the brine is further evaporated to the desired concentration for transfer to the harvest ponds where sylvinite (a physical mixture of KCl-NaCl) will precipitate after further evaporation. The brine is held in the harvest ponds until it reaches a concentration of about 22.0% $MgCl_2$. The brine is then transferred to holding ponds where further evaporation results in the precipitation of other salts - primarily carnalite.

The sylvinite precipitated in the harvest pond averages 30% KCl and 70% NaCl. This material is removed from the harvest ponds by 23 cubic yard self-loading tractor scrapers and hauled to the mill where it is processed to liberate the KCl crystals from the NaCl crystals. It is then subjected to two stage froth

Comment Letter 14

flotation. The flotation concentrates are washed, centrifuged to a moisture content of approximately 4.0% and transferred to the concentrate stockpile. The concentrates (96.0% + KCl) are dried in a direct fired rotary dryer and then either transferred to covered storage as standard grade potash or used in the compactor system for coarse grade potash production. Dross salts are produced by drying sylvinite and then blending additional potash with this material during the loadout process to produce the desired KCl:NaCl ratio in the shipped product.

The Wendover Plant produces four basic types of brine salts from the pond system.

1. Potash (KCL): Potassium chloride is harvested as described above as a 30% KCL and 70% NaCl (sodium chloride) material called brine residue. This mixture in crystalline form is fed to the mill for upgrading and removal of the NaCl. The final product, potash, is sold in three forms: coarse, a compacted product for dry fertilizer applications; standard, with a smaller particle size for fertilizer compounding, oil field completion fluids and as a flux in certain metal recovery processes. Soluble fine, the third form of potash made at Wendover is used predominately in liquid fertilizer solutions.

The farming industry of Oregon, Idaho, California and to a lesser extent Northern Utah and Eastern Washington depend heavily upon Wendover's potash production. The strategic location of the Wendover Plant in close relationship to heavy farm markets versus alternative sources of potash in distant Canada or New Mexico underscores the necessity of continued production.

The Wendover Plant supplies potash to major farm regions in Idaho (potatoes) and California (produce) from which all U.S. consumers benefit.

During drought years potash's importance is even greater as more of the product is required per farmed acre. Potash acts to enhance nutrient absorption and protects the plant during stress. Continued dry years will mean even greater regional demand as production per acre must increase as less acres are planted due to lack of required water.

The United States annually produces less than 20% of the potash required. Wendover (Bonneville Salt Flats) represents one of the few remaining potash reserves in the United States capable of greater production. The majority of the U.S. potash needs are

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imported from Canada or the Middle East. However, imports to the western United States would be very expensive in relation to the costs paid by mid-west growers.

Without Wendover's continued viability, Intermountain and Pacific Coast growers would be placed in even a more difficult cost basis if they were required to depend upon imported potash.

2. Magnesium Chloride: This product is sold as a solution (28-35% $MgCl_2$ in water). The brine is used as a dust control/road stabilizer, an anti-freeze for road salt, coal piles and tailings and as a raw material source of magnesium ion for magnesium metal smelting.

Nuisance dust from unpaved roads is prevalent throughout the western U.S. $MgCl_2$ brine is enhanced to DUSTOP™ and sold to the National Forest Service, mining companies, state and county agencies and numerous other private concerns to suppress dust. The air quality and conditions on these unpaved roads is greatly improved by application of our product. The product, based on the $MgCl_2$ brine, is very economical and allows treatment to roads that previously would not have had any dust suppression. $MgCl_2$ brine from Wendover as a raw material for magnesium metal plays a critical role in the continued viability of Amax Magnesium's smelting operation in Rowley, Utah.

With the flooding of Amax's pond system due to the previous high levels of the Great Salt Lake, Wendover's supply of $MgCl_2$ brine was strategic as a supplement. During the last three years $MgCl_2$ brine from Reilly Wendover's operation helped Amax's smelter to remain in operation. (Amax provides 500 jobs to the local economy.)

As Amax's new pond system nears completion and the lake levels continue to drop, supplemental $MgCl_2$ brine from Reilly Wendover may continue to augment their own production. Reilly Wendover's continued growth and development could remain extremely critical to Amax's operation in the future.

3. Brine Residue of Potash or Manure Salts: Reilly Wendover supplies manure salts (30% KCL and 70%NaCl) to several aluminum secondary recovery smelters throughout the U.S. The manure salts act as a fluxing agent to reduce the melting point of the scrap aluminum. Recovered aluminum processes use only 10% of the energy to produce a pound of aluminum in comparison to initial virgin metal production in a smelter. The Reilly Wendover product is unique in its properties in that the KCL/NaCl combination is

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not a blend of two mixtures, but a single crystal. This inherent characteristic enhances aluminum recovery in the secondary smelting process.

Increasing secondary aluminum recovery is a necessary energy conservation factor as demand for aluminum increases.

4. Salt: Used as a raw material for chemical manufacturing, road de-icing and water softening. Major West Coast chemical producers now depend upon imported salt from Mexico, although they could use salt produced and harvested from Reilly Wendover. There is keen interest in future development.

General Comments

Reilly believes that it is important to be a contributing participant in the resource management process and, therefore, has chosen to provide comprehensive comments with respect to the mineral development portion of the RMP. These comments are organized to provide a series of comments that apply generally to the entire resource management process and also a series of specific comments with respect to the actual text of the RMP as presently drafted. In addition to these comments, Reilly offers whatever other assistance it might appropriately give in connection with the preparation of an acceptable impact statement and the adoption of a final resource management plan.

14.1 Reilly has reviewed the RMP in some detail and has reviewed the provisions of Subpart 1610 of Title 43 of the Code of Federal Regulations which govern the preparation of resource management plans. It is Reilly's position that the RMP does not satisfy the obligations of the regulations with respect to resource management planning and environmental analysis. Therefore, it is Reilly's position that the RMP must be withdrawn and a new draft must be prepared which follows the requirements of the governing statutes and regulations. The revised RMP must also fully evaluate all competing uses of the public lands before any decisions are made with respect to resource management.

14.2 It is Reilly's understanding of the planning process that a resource management plan is required to provide a comprehensive framework for managing public lands within the Pony Express Resource Area (RMP page 11). Based upon Reilly's review of the RMP, it is Reilly's position that the RMP does not fully evaluate the importance of mineral development within the Pony Express Resource Area. This is particularly true as it applies to what is characterized as "solid leasable minerals." It is Reilly's

Response to Letter 14

14.1 We disagree with your conclusion. Your comment does not identify how or why the Draft RMP/EIS does not meet the requirements of the cited regulations. Therefore, no response is possible.

14.2 Please see Comment Responses 14.3 and 14.5.

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position that the BLM must more fully evaluate the mineral development potential of the Bonneville Salt Flats and surrounding area and must give greater recognition to the future development of this valuable resource in management planning. The comments which follow provide the detailed support for these conclusions.

One of the first concerns of Reilly with respect to the present draft of the RMP is the fact that it appears that the decisions were made with respect to management of the potash resources before the planning process began.

14.3 As referred to previously, in Chapter 1 concerning "Purpose and Need," it is specified that the BLM's continuing mineral resource policy is to foster and encourage the orderly and economic development of domestic mineral resources. It is also specified that the needed management decisions include questions as to which areas should be open for mineral exploration and development and which areas should be withdrawn from mineral entry (RMP page 15). Notwithstanding these two statements, it is clear with respect at least to potash, that those decisions were made before the impact statement was prepared. Thus, it is apparent that a decision was made at some time in the past concerning the closure of approximately 104,000 acres of land to further leasing of solid minerals (RMP page 42). While we are unaware of an environmental impact statement that was prepared in support of that decision, it appears to Reilly that such a conclusion is to be the result of the environmental impact statement process currently underway rather than the conclusion upon which the environmental impact statement is prepared.

14.4 This same concern also applies to the designation of the Bonneville Salt Flats as an Area of Critical Environmental Concern ("ACEC"). Page 196 of the RMP specifies that in 1985, an area of 30,203 acres of the Bonneville Salt Flats was "designated as an ACEC." We are not aware of the environmental impact statement that was prepared in support of such a decision nor are we aware that notice was given to all interested parties with respect to that decision. However, as we read the provisions of 43 CFR § 1610.7-2 it appears that whenever a draft resource management plan, or a plan revision, or a plan amendment is proposed which would involve an ACEC the State Director is required to publish a notice in the Federal Register listing each ACEC proposed and specifying the resource use limitations that will apply. This would apply to the first action and any subsequent action regarding an ACEC.

Response to Letter 14

14.3 The decision to close 104,814 acres to further leasing for brines extraction was made in 1982, and was reaffirmed in the Tooele Management Framework Plan (MFP) in 1984. The MFP was prepared in accordance with planning regulations applicable at the time. Following the designation of the Bonneville Salt Flats as an ACEC in 1985 (see April 24, 1985 Federal Register, p.16157), the closure also became a feature of the ACEC Management Plan and the Bonneville Salt Flats Special Recreation Area Management Plan (RAMP), both prepared in October, 1985. The closure was brought forward into the Draft Pony Express RMP/EIS as a feature common to all alternatives. The impact to brine extraction industries would be continued closure of the above acreage until it becomes clear that such closure is unnecessary to maintaining the quality of the area.

14.4 Notice was placed in the Federal Register on April 24, 1985. An EIS was not prepared for the designation of the Bonneville Salt Flats as an ACEC. At the time the designation was made there was no requirement to prepare an EIS. Environmental assessments, while not required, were done for several resource-use limitations related to the Tooele MFP decision to designate the ACEC. Uses experiencing limitations included land tenure adjustment, fluid minerals, geothermal leasing, locatable minerals leasing, potash leasing, visual resource management, and off-road vehicle designations.

The Pony Express RMP/EIS does not "propose" designating the Bonneville Salt Flats as an ACEC. The ACEC is an existing entity since 1985. The scoping activities that preceded preparation of the Draft RMP/EIS did not identify any concern with the continuance of the existing ACEC. The ACEC was not included in the list of proposed ACECs that were identified in the Federal Register notice of availability of the Draft RMP/EIS because it has already been designated.

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Mr. Howard [illegible]
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We are not aware and have not been able to locate any information concerning such a publication and evaluation regarding the "1985" designation. Nor are we aware that the appropriate notice has been given with respect to the Bonneville Salt Flats ACEC proposed in the RMP.

The notice in the Federal Register of May 13, 1988, did not mention the Bonneville Salt Flats ACEC nor did the notice contain the information required by the regulations with respect to the proposed ACEC's that were mentioned. We will discuss the specifics of the ACEC designation later in this letter, but our general comment is that it appears that the ACEC designation with respect to the Bonneville Salt Flats is a conclusion rather than a means by which the use of the ACEC designation is evaluated. Thus, it appears to Reilly that the BLM has not followed its own regulations in the designation of an ACEC. The BLM has prepared a draft environmental impact statement to support its prior decisions in that regard rather than one in which all significant resources are evaluated on an equal footing basis and all of the environmental impacts are fully evaluated to assist in the management process.

A third area of general concern relates to the fact that the RMP generally ignores the importance of the existing mineral resources and the potential for future development of solid leasable minerals within the Pony Express Resource Area. As outlined above, Reilly's operation makes a significant contribution to the State and national economy. Reilly believes that the potash resource offers the potential for continuing mineral development and that future development can take place under principles of balanced multiple use management while still protecting other resources. 14.5

The RMP specifies that the potash leases held by Kaiser (now Reilly) near Wendover are the only active leases on public lands in the entire resource area (RMP page 73). The RMP also states under "Social and Economic Considerations" that the greatest contributions to the economy come from potash production near Wendover (RMP page 110). Notwithstanding these statements, there is no planning whatsoever for future development of these important resources.

It is also interesting to note that the references used in the compilation of the RMP as found at pages 202 and 203, contain not a single reference to any of the published data concerning solid leasable minerals. Also, while the RMP contains such information as the average sheep ranch budget and the average 14.6

Response to Letter 14

14.5 The appearance of "ignoring the importance of existing mineral resources" is a reflection of the amount of information available at the outset of RMP/EIS preparation. If the subject being addressed in the RMP was not identified as an issue or determined to be of significant public concern, that subject has not been discussed in detail beyond what was determined to be appropriate by the planning team. Such is the case with Reilly's potash operation. Reilly's expressed concerns have become known at the mid-point of the planning process rather than at the beginning. BLM agrees with Reilly that present and future potash development "can take place under principles of balanced multiple-use management." The purpose of the closure of 104,814 acres is to provide a margin of safety to the Bonneville Salt Flats until such time as it is known whether or not potash extraction within the closed area, or areas beyond, would have an adverse impact on the ACEC. Once this is known, the closure could be left in place as is, reduced or increased in size, or eliminated as appropriate.

14.6 The following references will be added to the list of references (see Revisions and Corrections for page 202):

1. Utah Geological and Mineral Survey, Donald T. McMillan. Bonneville Salt Flats: A Comparison of Salt Thickness in July 1960 and October 1974, Report Investigation No. 91, 1974.
2. "Lines Report", see Response 14.8.
3. Dames and Moore, "Inventory and Market Analysis of the Potash Resources of the Great Salt Lake Desert, Utah," 1978.
4. UDOT, "Salt Flat Investigation," Progress Report Parts VI-XII, 1962.

In addition to these references, approximately 30 other publications are also available at the Salt Lake District Office.

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14.7 cattle ranch budget for animal production operations within the area, there is not the slightest indication as to the potential social and economic benefits to be derived from future potash leasing whether within the area of the Bonneville Salt Flats or outside that area. From Reilly's perspective we can only assume that this information was deleted from the RMP because the management decision had already been made that no future leasing would take place north of I-80 and the area south of I-80 on Federal lands has no potential. Therefore, it was better to ignore those significant values rather than try to justify why the management decisions were contrary to the obvious economic benefits to be obtained.

The fourth general comment with regard to the RMP relates to the consideration of alternatives. Again, this comment applies specifically to the evaluation of the future development of solid leasable minerals. One of the essential requirements of a resource management plan is the consideration of all reasonable resource management alternatives. 43 CFR §1610.4-5. The regulations, therefore, require that several complete alternatives must be developed for detailed study within the resource management plan. Once those alternatives have been identified, the area manager must estimate and display the physical, biological, economic, and social affects of implementing each alternative. 43 CFR §1610.4-6. Only after a full evaluation and estimation of the effects of those alternatives can the area manager establish a preferred alternative for incorporation into the draft resource management plan. 43 CFR §1610.4-7.

14.8 Generally, the RMP does contain an evaluation of alternatives. However, with respect to solid leasable minerals, no alternatives are considered. In fact, there is no consideration given to any management action other than the absolute closure of over 104,000 acres to future leasing (RMP page 42). The stated reason for this position is "to protect the hydrologic balance critical to maintaining the Bonneville Salt Flats." However, it is impossible from the materials contained in the RMP to even evaluate whether or not that conclusion is accurate. In fact, as previously mentioned, it does not appear that any "references" relating to the hydrologic balance were even considered in the preparation of the RMP. (RMP pages 202-203).

The case law surrounding the evaluation of alternatives is very clear. It is well established that the purpose of the "alternatives" requirement is to assure that the government agency, as a decision making body, has considered methods of achieving the desired goal other than the proposed action.

Response to Letter 14

14.7 The Draft RMP/EIS did not analyze the future social and economic benefits that would be realized from future potash leasing. BLM has no information to indicate that any change in the current level of potash production is likely. The RMP/EIS has assumed that Reilly's current level of potash industry is not imperiled by the six-year-old closure. It also assumed that present reserves and leases would sustain that industry into the distant future at current levels of production. If this is not the case or if the company definitely plans to expand in the next few years to production levels that would exceed existing reserves, please provide this new information to us.

The only limitation on future leasing is the area now closed to leasing. It is the position of BLM that there are no reasonable alternatives to the course of action prescribed for protection of the Bonneville Salt Flats ACEC until the effects of brine extraction are better known.

14.8 See Responses 14.3 and 14.7 concerning alternatives for potash leasing. The point is well taken that the RMP/EIS presents no reference to document that the hydrologic balance could be impacted by potash extraction within the area closed to leasing. There is such documentation in the 1979 USGS Water Supply Paper No. 2057, entitled Hydrology and Surface Morphology of the Bonneville Salt Flats and Pilot Valley Playa, Utah. This document, often referred to as the "Lines Report" after its author, shows a link between brine removal and direction of flow of brines in the Bonneville acquifer. In the conclusion of his report Lines states: "Weather cycles may partly explain changes on the Bonneville salt crust. However, the activities of man, such as withdrawing brine and constructing surface drainage barriers, have altered the hydrologic environment and have had a profound effect on the salt crust." The Lines Report is the principal scientific evaluation upon which the need for the initial and continued closure is based.

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Piedmont Heights Civic Club, Inc. v. Moreland, 637 F.2d 430 (5th Cir., 1981). In the area of the Salt Flats, it is obvious that there are conflicts concerning the alternative uses of available resources. The courts have clearly held that the National Environmental Protection [Policy] Act requires the agency to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." 40 USC §4332(2)(E) as quoted in River Road Alliance, Inc. v. Corps of Engineers of U.S. Army, 764 F.2d 445, 452 (7th Cir., 1985). Therefore, the courts have concluded that the existence of a viable but unexamined alternative renders an environmental impact statement inadequate. Citizens for a Better Henderson v. Hodel, 768 F.2d 1051 (9th Cir., 1985).

14.9 Since there are competing potential uses of the Salt Flats area and since the RMP totally ignores the alternative of future mineral development within the Salt Flats area, one can only conclude that the environmental impact statement is inadequate. Reasonable alternatives must be considered before a final impact statement can be issued and a final decision made with respect to the future management plans for the Salt Flats area. Among those alternatives must be the possibility that leases would be issued in the future in the Salt Flats. The possibility that the Salt Flats area would not be designated as an ACEC must also be considered. It is also suggested that even if the ACEC designation is retained, the RMP must fully evaluate those management practices and uses, including mitigating measures, that are required to protect the resources identified as relevant to the ACEC.

14.10 A fifth general area of concern relates to the fact that sustained multiple use of the public land, specifically in the area of the Bonneville Salt Flats, does not appear to have been adequately addressed. Again, this is a problem that permeates the entire RMP but can be identified with some specificity. Stated differently, it appears that the RMP was prepared, at least with regard to the Salt Flats, with a single use management direction rather than a multiple use management direction. With respect to the Salt Flats, it appears that recreational uses are the only values considered relevant. This general thread runs throughout the entire RMP. There is no general consideration of the competing alternative uses for the Salt Flats. There is also no clear evaluation of methods whereby the competing uses could continue to exist in a harmonious relationship. This is of particular concern given the fact that we were told at the public meeting, by BLM personnel, that those within the recreational use

Response to Letter 14

14.9 The RMP does not totally ignore future mineral development within the area of the Bonneville Salt Flats. The RMP recognizes the rights of the holder of existing leases within the closure area to develop those leases. Lands outside of the closed area are available for leasing. When new data warrant a change, the area closed to leasing may be modified or eliminated as appropriate.

Regarding alternatives, see Responses 14.3 and 14.7.

14.10 The Draft RMP/EIS has addressed the Bonneville Salt Flats in a multiple-use resource management approach. This is a biologically sterile and geologically unique area that precludes consideration of wildlife, plants, domestic livestock, watershed, cultural resources other than historical recreational use, fire, and forestry. All that remains to be managed are visual resources, minerals, and recreation. These are all included in the analysis of the Salt Flats area. Each is identified by management actions designed to make development and use compatible with ACEC values. Only new information concerning the effects of potash development on the Salt Flats can answer whether and to what extent potash extraction causes change in the area covered by the ACEC designation. Such data are not now available.

See Responses 14.1, 14.3, 14.4 for a discussion of our analysis of issues.

Concerning whether extraction of brines for potash is improving racing conditions, the salt on the Bonneville Salt Flats was excellent in 1986 and 1987. During preparation of the salt for the 1988 racing year, it was found that the salt was only approximately 4 inches thick where markers have been augered into the crust. This year the salt has also been very rough. These changed conditions reflect the effects of local precipitation through the recent two-year wet cycle followed by this dry year. Many published reports conclude that the total salt content on the Bonneville Salt Flats is diminishing. It is apparent that the area's uses deserve further study.

The Draft RMP/EIS addresses the items on page 15 of your letter. However, the comment is too general to provide specific responses.

BLM disagrees with Reilly's assertion that the present draft must be withdrawn and a new draft produced.

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community have even stated that the condition of the salt for racing has been better within the past few years than it has ever been. If this statement were found to be true, then one could argue that it is possible that potash development has contributed to the better racing conditions. Reilly believes that such a possibility must be fully evaluated. It is also Reilly's conclusion that the RMP does not fully address the issues identified on page 15 with respect to mineral development. Without doing so, the RMP must be considered inadequate. For the reasons stated, Reilly believes the RMP must be withdrawn and a new draft prepared in accordance with the regulations.

Specific Comments

In order to provide relevant input, Reilly has reviewed the RMP page by page and now provides specific comments with respect to the text of the RMP. The comments concerning the text are in page order to allow you to follow the comments directly. Also, we have not commented on the content of the summary inasmuch as it reflects what is contained in the body of the RMP. Obviously, the summary would be changed to the extent changes are made in the relevant text.

14.11 First, where a reference to Kaiser appears we would suggest, if it is appropriate, that the reference should be changed to Reilly.

14.12 Beginning with Chapter 2, the description of the alternatives, we have found that under the lands program there is some confusion as to the specific tracts identified for land disposition. From our review, it appears that the detailed legal descriptions contained in Table 2-1 do not necessarily correspond to the land blocks depicted on the figures relevant to each alternative. One specific problem we have identified relates to the description of Parcel 9 as contained on pages 21 and 22 compared with the content of Figures 2-7 and 2-17. The figures show lands in Township 1 South, Range 17 West, Sections 20 (E½, 21-28, 29 (E½), 33-35; and Township 2 South, Range 17 West, Sections 1, 3, 4, 5 (E½), 8 (E½), 9-15, 17 (E½) which do not appear in the legal description. The maps and descriptions should be compared to insure both are accurate.

14.13 Another specific comment with respect to the lands program relates to the consideration as to whether or not minerals will be the subject of disposition. While reference is made to the fact that Section 203 of FLPMA will be used as the statutory authority for disposal, there is no indication as to the

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14.11 We acknowledge the need for correction. References in this document have been changed to Reilly.

14.12 The legal description as shown in Table 2-1 on pages 21 and 22 is correct. Since Parcel 9 is not part of the disposal tracts in the Proposed Plan, a corrected map will not be published.

The lands in Parcel 9 were originally identified in the Tooele MFP for disposal through exchange. This was to allow Kaiser the opportunity to block up their holdings south of the interstate and to enable BLM to better protect and manage the public lands around the salt flats. However, the State of Utah selected a major portion of these lands through the State In-Lieu entitlement program. Under the Proposed Plan the remaining lands south of the interstate and east of Reilly's holdings would be available for exchange as described in Proposed Lands Decision 3.

14.13 Minerals can be disposed of under Section 209 of FLPMA at fair market value.

In conjunction with other documents prepared for a land disposal, a mineral report is prepared by a BLM geologist or mining engineer. FLPMA Section 209 provides that for lands with no known minerals values, the mineral estate may be conveyed with the surface. If there are known mineral values, the mineral values may be reserved to the Federal government or conveyed if the following criteria are met:
(1) reservation of the mineral rights in the United States interferes with or precludes appropriate non-mineral development and such development is a more beneficial use of the land than mineral development, or (2) fair market value of the mineral interest is received. Development of reserved mineral interests will be under existing law.

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management considerations given to mineral utilization. It is suggested that in order to properly plan for the future, the RMP should contain an evaluation as to those lands where minerals would be subject to disposal and those lands where minerals would be subject to retention and management by the BLM. Where the minerals are retained, management alternatives must be discussed.

14.14 Obviously, page 42 under the caption Other Leasable Minerals would need to be significantly modified given the general concerns previously expressed. It is essential that an alternative must be considered to the no lease status of the 104,814 acres which are apparently in and about the Bonneville Salt Flats ACEC.

14.15 The other significant defect with respect to the materials on page 42 concerning Other Leasable Minerals is the fact that conclusions are stated without any supporting basis in fact. Two of these conclusions are found in the third sentence of the first paragraph and the last sentence of the first paragraph. The third sentence contains the statement that newly acquired lands will be closed to leasing "to protect the hydrologic balance critical to maintaining the Bonneville Salt Flats." There is no support that we have found for this conclusion.

14.16 As we will discuss in the evaluation of the ACEC, there is also no information to indicate what is meant by "maintaining" the flats. Reilly suggests that maintaining the flats implies that the Bonneville Salt Flats will be managed in such a manner as to fully utilize all available resources involving both mineral and recreational resources. It also means that management restrictions imposed within the ACEC will relate to the relevant resources identified. Certainly one can argue that the crowds attendant to racing are significantly more disturbing to the viewing of "unique vistas" than is the development of the potash resource. Such factors must be considered in the final management decisions regarding the ACEC.

14.17 Similarly, the last sentence of the paragraph contains the conclusion that the area of the closure is large because "this form of mineral extraction has the potential to disrupt the natural hydrologic processes." Again, there is no support for this conclusion. In fact, we have been unable to find a reference in the RMP to the Lines' report, even though that report has been cited to us at the public meetings as the source for that information. If that report was used as the basis for the conclusion it should be identified as one of the references. If the factual information available to the BLM because of actual

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14.14 See Comment Response 14.3 and 14.7.

14.15 A correction to the third sentence will be made to complete the existing sentence with these additional words: "until additional data verifies that such closures are not needed." See Revision and Corrections for Page 42.

Several studies indicate that brines extraction may significantly affect salt conditions on the Bonneville Flats. These are identified in Response 14.6 and will be added to the list of references.

See Revisions and Corrections for Page 42 for changes to sentences 4 and 5 under the heading "Other Leasable Minerals".

14.16 The term "maintenance" refers to the preservation of the 30,203 acres of crystalline salt surface within the ACEC so that quantity and quality of the salt surface do not decline as a result of human activity on and around the ACEC.

The presence of crowds for a few days on two or three occasions per year to view and participate in motorized racing events does not violate visual resource management classifications that are intended to prevent enduring and long-term adverse change in visual quality through human-caused events.

14.17 See Response 14.6 for references added to support the concept that brine extraction could cause disruption. After review of many documents and reports and discussion of the hydrologic aspects with USGS-WRD and UGMS, we agree that the issue of the recent local weather conditions deserves further study. The USGS indicated that because of the West Desert Pumping Project, a unique opportunity exists to evaluate and model hydrologic conditions and stresses. Many new sampling and brine models have evolved since the "Lines Report." BLM invites Reilly's involvement in any future studies.

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hydrologic occurrences over the past few years contradicts the information contained in the Lines' report, that data should also be considered in the evaluation process.

In an effort to evaluate the BLM position, we have obtained and reviewed the report by Gregory C. Lines entitled: Hydrology and Surface Morphology of the Bonneville Salt Flats and Pilot Valley Playa, Utah. Geological Survey Water Supply Paper 2057 (1979). Without fully evaluating the content of the report, it is apparent that two factors have a great impact on the "natural process." First, man's activity and second, unpredictable weather cycles. Lines page 105. Since the report was prepared we have experienced the most significant weather change in over one hundred years and "man" has started the West Desert Pumping Project. It is totally unreasonable to base future management decisions on the Lines' Report without some evaluation of the events that have occurred in the eleven years since the field work for that report was completed.

Reilly has found that a great quantity of important technical information is available both publically and privately. This available literature must be given proper consideration in the resource management process. Without a full evaluation of the best information available the BLM management decisions will be subject to challenge as not complying with statutory requirements and not being in the best public interest.

14.18 We have also suggested that the fourth sentence in the paragraph previously referred to could be modified to avoid the implication of a veiled threat to Reilly. Our suggested language in this regard would be something to the effect: "This closure does not affect existing leases. The contractual rights of Reilly under the existing leaseholds will be honored." It appears to us that this language accomplishes the same purpose without the implication that the BLM will "nit-pick" Reilly with respect to the "lease requirements" in order to try to void the leases in the future.

14.19 On page 43 of the RMP under the heading "Water," there is also a confusing statement. Obviously, Reilly is concerned with the continued maintenance of its water rights. In the second paragraph under the heading water in the last sentence, there is some question as to the intent of BLM. Reilly suggests that the sentence should read "Public water rights on public lands . . ." If that is not the intent then there must be some hidden meaning to the sentence. If the use of the word "private" as the first word of the sentence is accurate, then the sentence does not

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14.18 See Comment 14.15.

14.19 The sentence has been clarified. See Revisions and Corrections for page 43.

BLM is responsible for the variety of uses that occur on public lands. If a particular use is associated with or dependent upon waters found on public lands and that water is controlled by a private party, the private party may exert a great deal of influence on the surrounding public lands. This situation could adversely affect BLM's ability to manage public lands. When there is a public need for waters on public lands and those waters are privately controlled and not available to the general public, BLM will make every effort to secure water for public use. This may be done in a variety of ways including entering into a cooperative agreement, developing other waters, purchasing a portion of the water right, or filing on the waters.

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appear to make sense. Inasmuch as Reilly has developed private water rights that are utilized for its processes having to do with public lands, the BLM policy in this regard is of some concern. This sentence should be changed to accurately reflect the BLM position.

14.20 Continuing to page 49, Reilly has previously raised the issue as to the need for both a special RMA on the Bonneville Salt Flats and an ACEC. It appears that the designation of an ACEC should be adequate to cover all management purposes and there is no need to designate the Salt Flats as a special RMA. On the other hand, if the real purpose is to promote racing, an ACEC designation is inappropriate. As we have mentioned at the public meetings and as we have mentioned previously in these comments, there is also some question as to whether or not a designation as an RMA is consistent with the "relevant resources" identified for the Bonneville Salt Flats. We are not aware of any studies that have been done to evaluate the impact of racing on the Salt Flats. This is especially important if, as stated at page 196, the Salt Flats are "highly sensitive to interruption by human activity." It is difficult to enjoy a "unique vista" if hundreds of racing fans are covering the Salt Flats. Hydrologic processes may be impacted by four-wheel drive recreationalists that drive off the Salt Flats onto the Mud Flats. These factors must be evaluated. It appears to Reilly that the RMA designation is inconsistent with the ACEC designation and should be reviewed to consider the elimination of one or the other of these designations.

14.21 The final comment with respect to features common to all alternatives relates to the paragraph headed "Areas of Critical Environmental Concern." As we have indicated, it is our conclusion that it is not appropriate under the requirements of the regulations or prior judicial decisions to eliminate alternatives that are reasonably available. Therefore, it is our suggestion that at least one of the alternatives must consider the elimination of the Salt Flats as an ACEC and that the draft Environmental Impact Statement must fully consider the impacts of such a decision.

14.22 Under the heading Comparison of Alternatives in Table 2-9 we suggest that page 60 must be amended under the heading "Minerals" in order to consider an alternative to the no leasing policy. The RMP is also deficient because it does not contain any consideration that new potash leases will be issued as to any lands nor is there any indication as to what lands have the potential for potash development. It is Reilly's position that

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14.20 The Bonneville Salt Flats Special Recreation Management Area predates the establishment of the ACEC. It presently includes 128,700 acres but the RMP proposes to reduce the area to coincide with the ACEC. Recreation, as provided for in the recreation plan, is an acceptable activity on the ACEC but requires special management in order to be compatible with ACEC values. The two designations (special recreation management area and ACEC) are not mutually exclusive because the recreation plan complies with the ACEC objectives while directing a use that is not a reason for the ACEC designation.

See Response 14.16 concerning crowds at races.

14.21 It is the position of BLM that elimination of the existing ACEC would not be a reasonable alternative. Eliminating all existing management actions that conflict with the goals of an alternative would result in unreasonable, unachievable, and socially unacceptable alternatives. Regardless of the goals of an alternative, it must incorporate trade-offs in the interest of achievable multiple-use management.

14.22 See Comment 14.3.

Your comment is noted. Chapter 4, page 121, Table 4-2 was provided to indicate the percentage of prospectively valuable solid leasable minerals which are closed or open to leasing. The lands closed include about 10 percent to 12 percent of those lands classified by USGS as prospectively valuable for potash. Reilly is correct in their contention that an identified highly saline area does lie within the no leasing area. Reilly already controls or has developed approximately 60 percent of this highly saline shallow brine area leaving approximately 40 percent of the area north of I-80 undeveloped. This is the area that requires further study to determine whether impacts to the Bonneville Salt Flats are occurring or will occur with future potash development. In areas open to leasing, any prospecting permit or lease application is evaluated utilizing existing support documents and any new information and is provided to the manager prior to issuing or denying an application.

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the Area Manager cannot adequately evaluate lease applications if the RMP contains no evaluation of lands having leasing potential. Those considerations must be added to the RMP.

On page 73, the RMP contains a heading "Solid Leasable Minerals." Under that heading it is stated that "most of the areas classified as prospectively valuable for solid leasable minerals lie within national forest boundaries." This statement raises at least two questions in Reilly's mind. The first is: Where is the description of the lands identified as prospectively valuable? We have reviewed the RMP and have been unable to identify the specific lands. The second question relates to the first question and is: Were no lands identified as prospectively valuable for potash leasing? Again, we are unable to answer this question from the RMP.

14.23 It is Reilly's position that during the environmental review process the identification of lands as "prospectively valuable" for leasing does not change based upon the management decisions previously made. It is Reilly's position that the mineral content of the lands determines whether or not they are prospectively valuable. Only after identifying those lands that are prospectively valuable can one then decide whether or not to actually issue the lease. Since it is clearly stated that the only active leases on public lands are potash leases held by Reilly near Wendover, we would assume that some evaluation would be contained in the RMP with respect to adjacent lands that might also be valuable for such leases. We have not found any reference to such a consideration in the RMP.

14.24 As previously mentioned on page 110 under the heading "Social and Economic Considerations," there is a statement that "the greatest contributions to the economy come from potash production near Wendover . . ." While we do not question the content of that sentence, we also do not find any support for that conclusion. Obviously, Reilly would appreciate being recognized for its contributions to the economy as more fully outlined above. We would also like to see some discussion of the economic benefits obtained by the public because of the prior decision to issue the existing potash leases. Such a discussion might also be relevant as management decisions are made with respect to future leasing.

14.25 Under Chapter 4 concerning environmental consequences, the first item of interest appears under alternative 1. As found on page 120, the only alternative considered with respect to the

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14.23 As stated in 14.22 above, prospectively valuable classifications are part of the supporting documentation of the MSA. See Revisions and Corrections for page 73.

14.24 The referenced statement was intended only to convey that income-producing mineral activity is presently limited in the Pony Express Resource Area and to identify those activities presently contributing most to the county economy. There was no intent to support the statement with an analysis of number of jobs, amount paid in salaries, taxes paid, etc. The Amax operation was inadvertently omitted although it is also a large revenue producer at the present time.

14.25 See Comment Response 14.3.

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104,000 acres of the Salt Flats is to retain the lands as "closed to new leasing." Again, Reilly objects to the fact that no consideration is given to the alternative of leasing these lands.

14.26 The second paragraph on page 120 under the heading Non-Energy Leasable Minerals is particularly troublesome to Reilly. If we read the substance of that paragraph correctly, it in effect says "BLM has previously decided not to issue any new leases for potash on the Bonneville Salt Flats. Once that decision was made, no one has expressed interest in leasing. No impacts will result because we have prevented any interest by our prior decision."

14.27 Reilly has an interest in leasing the lands of the Bonneville Salt Flats for potash and by this letter puts the BLM on notice of that interest. Reilly has no effective method to express that interest if the area is already closed to future leasing and the BLM is not considering any alternatives to that decision. It is Reilly's position that there is a significant impact caused by the fact that the BLM has elected not to grant any future leases on the Bonneville Salt Flats. The impact of that decision not only affects Reilly in its future operations but it also has a serious impact on the potash reserves of the United States. It is Reilly's position that the logic of this entire paragraph is flawed and must be reconsidered in the final RMP.

14.28 Appendix 2 beginning at page 151 contains another example of a built-in prejudice in the RMP. Under the heading Bonneville Salt Flats, there is a description of the Bonneville Salt Flats but there is not one word of mention of the fact that potash development has occurred for almost as long as the history of racing in the same area. (See Lines' Report page 4.) Under this heading there is no indication of the economic importance of mineral development to the viability of the city of Wendover, nor is there any indication of the fact that Congress felt the Salt Flats were of such economic benefit that special congressional legislation was enacted in order to allow for the mineral development. See Act of October 2, 1917 (40 Stat. 297) and act of July 2, 1932 (47 Stat. 566). It is our conclusion that the BLM has either defined the Bonneville Salt Flats to exclude those areas that have been developed for their mineral resources, or the BLM is so prejudiced against mineral development that it has chosen to ignore 70 years of history. Obviously, Reilly feels that recognition must be given to the value of the Salt Flats for its mineral potential both past, present, and future.

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14.26 See Revisions and Corrections for page 120.

14.27 See Comment Responses 14.25, 14.3.

14.28 Actually, what we have here is neither a definition designed to exclude mineral development nor extreme predjudice, but an oversight of an activity that is indeed a part of the history of the salt flats. We have revised the referenced section to include mineral development. See Revisions and Corrections for page 151.

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14.29 With respect to Appendix 8 concerning the ACEC evaluation process, we have previously indicated that it is our reading of the regulations that whenever a resource management plan is adopted a specific process must be followed with respect to all potential ACEC's. The only consideration given to the Bonneville Salt Flats is that it should "be continued." Again, while the RMP seems to indicate that all of the necessary regulations were followed in the initial designation of the Bonneville Salt Flats as an ACEC, we have been unable to locate that supporting material. If that information exists, it is not referred to in the references used in the compilation of the RMP.

14.30 Another concern with the content of Appendix 8 relates to the fact that the regulations require that the notice published in the Federal Register with regard to the ACEC must clearly identify the proposed ACEC and then must specify "the resource use limitations, if any, which would occur if it were formally designated." 43 CFR §1610.7-2 (b). From Reilly's perspective, it would appear that a specification of resource limitations should be contained in the RMP and the notice. It would also appear that the resource use limitations should correspond to a preservation of the identified "relevant resources." This is of critical concern to Reilly given the fact that the ACEC is identified to have 30,203 acres (RMP page 196) while the area closed to future leasing contains a total of 104,000 acres (RMP page 120). We find no explanation in Appendix 8 or otherwise in the RMP to explain why the area closed to leasing must be three times the size of the ACEC. We also do not find any explanation as to what the "resource use limitations" will be other than the no leasing policy. The RMP must explain why 104,000 acres must be closed when the ACEC contains only 30,000 acres. The RMP must also provide reasonable support for the conclusions reached and the management decisions made.

14.31 Reilly also questions how the designation of 104,000 acres for non-leasing status can improve or preserve either the historic values or the scenic values of the ACEC. Future potash development is not going to impact historic values in any way. Also, as previously mentioned, scenic values are disturbed much more by the hundreds of people out on the salt in connection with racing than it is by the almost insignificant visual impact caused by mineral development. The only possible impact could be to the natural systems and again there has been no conclusive evidence that mineral development has caused any affect on the geophysical processes.

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14.29 See Comment Responses 14.3, 14.4.

14.30 The ACEC is not a proposal. The Draft RMP contains the resource prescriptions related to the ACEC. These are ORV designations, visual resource management categories, and fluid mineral leasing categories, mineral withdrawals and closures, and recreation management objectives.

The 104,814 acres closed to potash leasing surround the ACEC and provides a buffer area that will help protect the salt flats from possible damage caused by extraction of brines from nearby areas. The closure is based on data that indicate brine removal may be impacting the salt flats, but the data are not conclusive. BLM, USGS, UGMS, and Reilly need to agree on studies that could be undertaken in the next two or three years to provide data for review of the closure. We believe that Reilly's extensive involvement in this research would be appropriate.

14.31 The closure is based primarily on the concern that damage may be occurring or could occur from brine extraction to the natural system that produces the salt flats. See Paragraph 2 of Response 14.30.

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Again, referring to the regulations, it is specified that the approved plan "shall include the general management practices and uses, including mitigating measures, identified to protect [the] designated ACEC." 43 CFR §1610.7-2(b).

14.32 If the ACEC designation is to be retained and if one of the considerations is a no leasing policy, then it is Reilly's position that the BLM owes the public a duty to fully evaluate the ACEC in accordance with the regulations. This would include not only an explanation as to why 104,000 acres are designated for "no lease" management while only 30,000 acres are contained within the ACEC, but it would also require an evaluation of the management practices and mitigating measures that are really required to maintain the "relevant resources." Reilly has found no justification or explanation for the decisions contained in the RMP with respect to the continued utilization for recreation activities at the expense of future leasing. As previously mentioned, Reilly also questions whether or not the combined RMP/ACEC designation is appropriate.

It is Reilly's conclusion that the entire ACEC designation must be revisited and compliance must be had with the requirements of the regulations and applicable statutes before any conclusions are reached with respect to the future management practices in the area.

14.33 With respect to the references contained at pages 202 and 203, we have previously identified the fact that references have obviously been used in the preparation of the RMP that are not contained on the list. Either the list should be complete, or the material from the references not referred to should be deleted from the RMP.

14.34 With respect to the figures contained in the back of the RMP, we have previously identified several inconsistencies. With respect to Figure 2-10, Reilly owns lands both north and south of Interstate 80 in the area of the Bonneville Salt Flats that appear to be subject to certain of the fluid mineral leasing categories. To the extent these lands are owned in fee by Reilly, they should be eliminated from the BLM management categories inasmuch as they are private lands. The same comment applies to Figure 2-13, Figure 2-19, and Figure 2-21. We also note that Figure 2-4, gives a visual resource classification to Reilly's lands in the vicinity of the Salt Flats.

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14.32 The Bonneville Salt Flats ACEC was designated following the regulations applicable at the time of designation (see Response 14.3). The purpose of the closure to further leasing is explained in Response 14.30. The management practices and mitigating measures required to manage the area for preservation of ACEC values are contained in the Draft RMP and the Proposed Plan. There is no justification in the RMP for using the salt flats for recreation at the expense of minerals because the justification is centered on preserving the ACEC values. Recreation use on the flats is allowed to the extent that it is compatible with ACEC values.

14.33 This comment does not identify what information should be supported by references. It is assumed that Reilly's concern centers on discussion of the closure of 104,814 acres to further leasing for extraction of brines. The USGS publication referred to in Comment Response 14.8 will be added to the list of references (see Revisions and Corrections for page 202).

14.34 Figures 2-10,2-13,2-19, and 2-21 erroneously included private land. Figure 2-13 has been corrected and brought forth in the Proposed RMP as Figure 5. The VRM figure is intended to identify classes for only public lands within the shaded areas.

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14.35 We have not been able to find a figure that depicts the 104,000 acres withdrawn from leasing. The RMP should contain either a description of those lands, a figure depicting those lands, or both.

14.36 We have specifically identified the problem with respect to Figures 2-7 and 2-17. Either the maps or the description needs to be corrected.

14.37 The Table of Contents at page vi identifies Figure A and B as being the reverse of the way they are identified on the actual maps. This error should be corrected.

We hope that the foregoing comments will assist you in the preparation of an adequate Pony Express Resource Management Plan and Environmental Impact Statement. If any additional information is required based upon the comments submitted, Reilly would endeavor to assist in the process to the extent appropriate.

Sincerely,

John E. Fendt

John E. Fendt
General Manager

Glenn D. Wadsworth

Glenn D. Wadsworth
Plant Manager

JSK/lc

8045K
080988

Response to Letter 14

14.35 A change has been made. Figure 3 includes the 104,814 acre solid leasable closure.

14.36 See Response 14.12.

14.37 This error is acknowledged. However, these maps have not been reproduced in the proposed plan.

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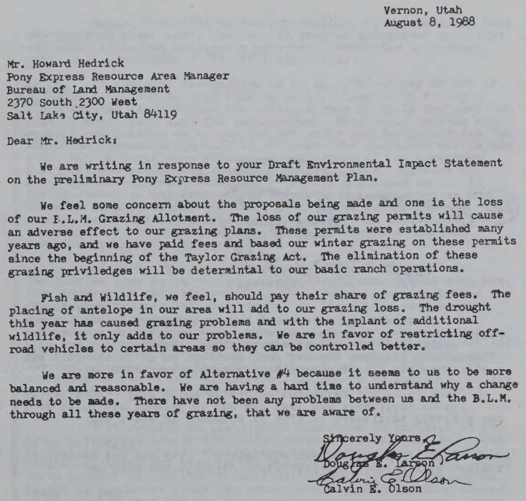


Vernon, Utah
August 8, 1988

Mr. Howard Hedrick
Pony Express Resource Area Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr. Hedrick:

We are writing in response to your Draft Environmental Impact Statement on the preliminary Pony Express Resource Management Plan.

15.1 We feel some concern about the proposals being made and one is the loss of our B.L.M. Grazing Allotment. The loss of our grazing permits will cause an adverse effect to our grazing plans. These permits were established many years ago, and we have paid fees and based our winter grazing on these permits since the beginning of the Taylor Grazing Act. The elimination of these grazing privilledges will be determintal to our basic ranch operations.

15.2 Fish and Wildlife, we feel, should pay their share of grazing fees. The placing of antelope in our area will add to our grazing loss. The drought this year has caused grazing problems and with the implant of additional wildlife, it only adds to our problems. 15.3 We are in favor of restricting off-road vehicles to certain areas so they can be controlled better.

15.4 We are more in favor of Alternative #4 because it seems to us to be more balanced and reasonable. We are having a hard time to understand why a change needs to be made. There have not been any problems between us and the B.L.M. through all these years of grazing, that we are aware of.

Sincerely Yours,

Douglas E. Larson

Calvin E. Olson

Response to Letter 15

15.1 In the Draft RMP/EIS, the disposal of Tract 26 (which affects the entire Vernon allotment) was analyzed in Alternatives 1 and 3. In BLM's preferred alternative (Alternative 2), Tract 26 would be retained and would only be considered for disposal through land exchange. This alternative has been carried forward as BLM's proposed decision; therefore, Tract 26 could be transferred from BLM ownership through exchange only, and impacts to all affected parties would be considered. The exchange criteria as stated in Lands Proposed Decision 3 must be met.

15.2 It is Federal policy that grazing fees should be assessed only on domestic livestock that utilize public lands. At this time the BLM is unaware of any pressure antelope in the Rush Valley area have made on livestock use. These reintroductions have taken place with relatively low numbers. Monitoring of the population and range condition will continue to be done to determine the continued productivity of the range.

15.3 BLM is mandated by Executive Order to analyze all the public lands and designate them as open, limited or closed to off-road vehicle use. ORVs are a legitimate form of recreational use enjoyed by thousands of Americans. BLM's objective is to allow such use in designated areas when appropriate, but also protect the resources, promote safety of users and minimize user conflicts. Limited and closed designations are provided to accomplish this.

BLM will monitor effects of the use of off-road vehicles. As needed, designations may be amended, revised, or revoked. Balanced use will allow ORV users certain areas to ride in and will also restrict or close use by off-road vehicles where resource impacts, safety or use conflicts arise.

15.4 See Response 15.1.

Comment Letter 16

DEPARTMENT OF THE ARMY
TOOELE ARMY DEPOT
TOOELE, UTAH 84074-5000

REPLY TO
ATTENTION OF

August 4, 1988

Environmental Office

Mr. Howard Hedrick
Pony Express Resource Area Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr. Hedrick:

Tooele Army Depot has reviewed the Draft Pony Express Resource Management Plan and Environmental Impact Statement (EIS) and concurs with this document as written. Tooele Army Depot requests that a copy of the final EIS be sent to this office.

Should you have any questions concerning this matter, please contact Mr. Larry Fisher, Chief, Environmental Management Office, (801) 833-3504.

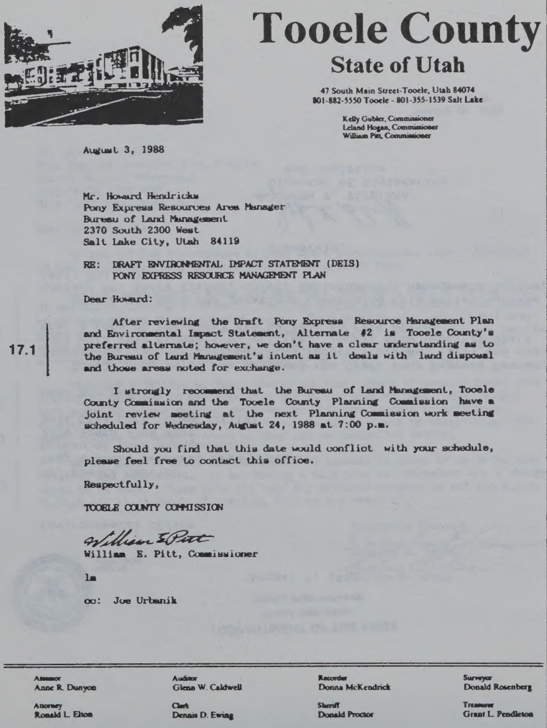
Sincerely,

John K Cluff
for JOSEPH T. TATEYAMA
Director of Engineering
and Logistics

Response to Letter 16

Your comments are appreciated.

Comment Letter 17



Tooele County

State of Utah

47 South Main Street-Tooele, Utah 84074
801-882-5550 Tooele - 801-355-1539 Salt Lake

Kelly Gubler, Commissioner
Leland Hogan, Commissioner
William Pitt, Commissioner

August 3, 1988

Mr. Howard Hendricks
Pony Express Resources Area Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
PONY EXPRESS RESOURCE MANAGEMENT PLAN

Dear Howard:

17.1 After reviewing the Draft Pony Express Resource Management Plan and Environmental Impact Statement, Alternate #2 is Tooele County's preferred alternate; however, we don't have a clear understanding as to the Bureau of Land Management's intent as it deals with land disposal and those areas noted for exchange.

I strongly recommend that the Bureau of Land Management, Tooele County Commission and the Tooele County Planning Commission have a joint review meeting at the next Planning Commission work meeting scheduled for Wednesday, August 24, 1988 at 7:00 p.m.

Should you find that this date would conflict with your schedule, please feel free to contact this office.

Respectfully,

TOOELE COUNTY COMMISSION

William E. Pitt

William E. Pitt, Commissioner

lm

cc: Joe Urbanik

Assessor Anne R. Dunyon	Auditor Glenn W. Caldwell	Recorder Donna McKendrick	Surveyor Donald Rosenberg
Attorney Ronald L. Elton	Clerk Dennis D. Ewing	Sheriff Donald Proctor	Treasurer Grant L. Pendleton

Response to Letter 17

17.1 BLM will meet with Tooele County officials on either the proposed date or another to explain land disposals and exchanges set forth in Alternative 2. Alternative 2 coincides with the Proposed Plan.

Comment Letter 18

UTAH WILDLIFE FEDERATION
POST OFFICE BOX 15636
SALT LAKE CITY, UTAH 84115

August 7, 1988

Mr. Howard Hedrick
Pony Express Resource Area Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Subject: Response to the Draft on the Pony Express management plan

Dear Mr. Hedrick

The Utah Wildlife Federation is pleased to have the opportunity to respond to the draft on the Pony Express Plan. We have read the draft carefully and have come up with the following comments.

18.1 1. We would like to see all of the Riparian areas given a high priority, so that work could be done on them. One suggestion we would have on these areas would be that livestock grazing be done only in moderation and then only in the spring and then they should be off limits to grazing. Forest Service studies show that this method works very well.

18.2 2. The Federation would support only alternative 4 as the draft is now written. We could support alternative 2 with some changes. The following would be the changes to #2 that we support. Parcels available for disposal would only be numbers 2,4,6,13,26a and 69. Parcels 98,70, 107,108 and 109 would only be available for land exchanges. All other parcels we would not accept disposal status on. The Federation strongly opposes Federal lands being disposed of, under any conditions. The BLM has the duty of managing the public lands, even if some of those lands are difficult to manage.

18.3 3. We would like to see the BLM take a harder look at the grazing permits in assuring that the number of livestock that is permitted on the land really is the number that are there.

4. With the exception of the above comments the Federation opinion is that the BLM has done a very good job on this draft.

DEDICATED TO THE CONSERVATION OF OUR NATURAL RESOURCES
AFFILIATED WITH THE NATIONAL WILDLIFE FEDERATION

Response to Letter 18

18.1 BLM's current policy gives priority to protection and improvement of riparian areas. All riparian areas identified in the RMP are on "I" category allotments which have the highest priority for management and project development. Allotment Management Plans have first priority for development on these allotments and some have been completed. The AMPs and in some cases the Multiple Use Management Plans will include riparian considerations when establishing the livestock management system and objectives for the allotment. The BLM is always looking for improved methods for management of its riparian habitat and will take your comments into consideration in the design of future management systems.

18.2 BLM is authorized to sell public land that is "...difficult and uneconomical to manage..." (Federal Land Policy and Management Act, Section 203(a)(1). Our analysis has determined that the parcels identified in Alternative 2 meet this disposal criteria. As depicted in Table 2 of the Draft RMP/EIS, page 55, parcels 70, 98, 107, 108, and 109 would only be made available to specific applicants for specific purposes. Review of Table 2-7 shows that these parcels would remain in public ownership, but managed by other public agencies. Your comment concerning BLM's duty to manage all public lands has merit. However, the remaining parcels identified for disposal have very few resource values. Unfortunately, our resources are limited and the time and dollars we spend managing these parcels of land takes time and dollars away from more critical areas where our resources may be better utilized.

18.3 Use supervision on BLM land is an ongoing program within the range department and is limited by the availability of funds. Within this limitation, every effort is made to assure that compliance with permits issued for livestock grazing on BLM lands are adhered to.

Comment Letter 18

5. The Utah Wildlife Federation will respond to the supplement to this draft on ORV use in the area when it is made available for comment.

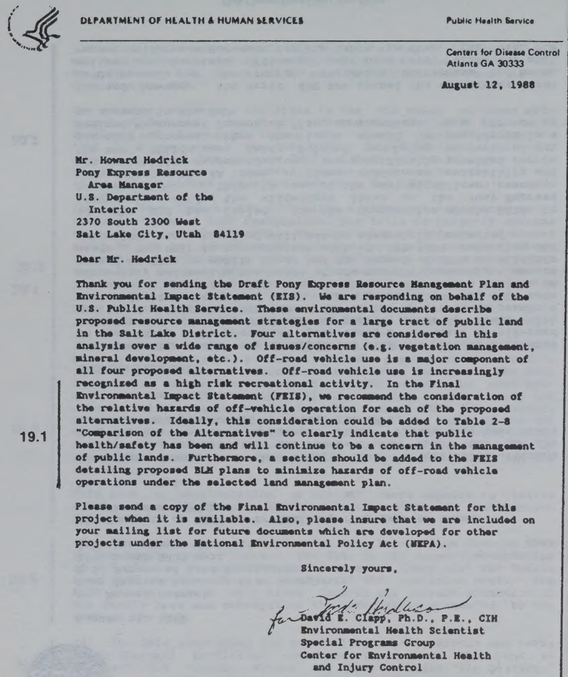
The Federation feels so strong about the land disposal issue that we will take what ever steps that may be necessary to insure that the public lands are protected for the use by all citizens of the country. We would like to thank you for the opportunity to make our comments on this draft. We will be looking forward to the final draft on this management plan.

Sincerely,

Patrick Sackett

Patrick Sackett
Second Vice President
Utah Wildlife Federation

Comment Letter 19



DEPARTMENT OF HEALTH & HUMAN SERVICES
Public Health Service

Centers for Disease Control
Atlanta GA 30333

August 12, 1988

Mr. Howard Hedrick
Pony Express Resource
Area Manager
U.S. Department of the
Interior
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr. Hedrick

Thank you for sending the Draft Pony Express Resource Management Plan and Environmental Impact Statement (EIS). We are responding on behalf of the U.S. Public Health Service. These environmental documents describe proposed resource management strategies for a large tract of public land in the Salt Lake District. Four alternatives are considered in this analysis over a wide range of issues/concerns (e.g. vegetation management, mineral development, etc.). Off-road vehicle use is a major component of all four proposed alternatives. Off-road vehicle use is increasingly recognized as a high risk recreational activity. In the Final Environmental Impact Statement (FEIS), we recommend the consideration of the relative hazards of off-vehicle operation for each of the proposed alternatives. Ideally, this consideration could be added to Table 2-8 "Comparison of the Alternatives" to clearly indicate that public health/safety has been and will continue to be a concern in the management of public lands. Furthermore, a section should be added to the FEIS detailing proposed BLM plans to minimize hazards of off-road vehicle operations under the selected land management plan. 19.1

Please send a copy of the Final Environmental Impact Statement for this project when it is available. Also, please insure that we are included on your mailing list for future documents which are developed for other projects under the National Environmental Policy Act (NEPA).

Sincerely yours,

David E. Clapp, Ph.D., P.E., CIH
Environmental Health Scientist
Special Programs Group
Center for Environmental Health
and Injury Control

Response to Letter 19

19.1 BLM acknowledges your comment on the importance of health and safety of the recreational user public. Also, we desire the safest recreational experience available for all users. Many forms of recreational use are associated with some type of risk: wind surfing, rock climbing, hunting, spelunking, hang gliding and, riding ORVs. Relative hazards are considered and recognized in BLM planning; however, given the enormous areas of use and styles of diversified users, a specific listing of all hazards in all areas would be extremely difficult.

As the population along the Wasatch Front increases and people look for new forms of recreation, ORV use has been increasing in Salt Lake, Utah and especially Tooele Counties. ORV use sometimes occurs in areas which are fragile or have high resource values. This use tends to intensify the controversy surrounding ORV use on public lands. The Salt Lake District will prepare a comprehensive off-road vehicle plan for the Pony Express Resource Area. The plan will review the decisions made in this document. BLM invites your participation in the preparation of this upcoming ORV plan.

Comment Letter 20

Sierra Club
Utah Chapter Conservation Committee

August 14, 1988

Mr. Howard Hedrick
Pony Express Resource Area Manager
U.S. Bureau of Land Management
2370 South 2300 West
Salt Lake City, UT 84119

RE: Comments on DEIS on Preliminary Pony Express Resource Management Plan

Dear Mr. Hedrick:

The Utah Chapter of the Sierra Club, a statewide citizens conservation organization, has reviewed the Draft EIS for the Pony Express Resource Management Plan. Please note that these comments were postmarked on August 14, 1988.

Our comments follow:

General Comments

20.1 (1) Overall, we are very disappointed with the options presented in the DEIS. The presented plan appears to cater to off-road vehicles and ignores protection of public lands in areas which qualify for ACEC designation. All of the alternatives permit a vast majority of the land under BLM's jurisdiction in this area to remain open for ORV use. This indicates a failure in adequately addressing the needs of the non-ORV community, impacts caused by ORVs on public lands and the impact of ORVs on wildlife needs. The DEIS is inconsistent with 43 CFR 8340 regarding ORV guidelines since the land will not be adequately protected.

20.2 (2) The BLM has failed, in the preparation of the DEIS, to adequately consider the wilderness issue in the Pony Express Resource Area. This is one of the most significant resource issues facing the RA today. Since wilderness suitability and non-suitability recommendations are specifically provided for in the BLM's "Wilderness Study Policy" as being a part of the planning process, then the issue should be considered in a revised Management Framework Plan, an amendment to a MFP, or as an element in the RMP.

Instead, however, the draft RMP has pushed the wilderness issue aside because of the current Statewide Wilderness EIS being written by the State Office in Salt Lake City. Since the most recent wilderness document for BLM lands in Utah, the "Utah BLM

Utah Chapter Sierra Club • State Office
177 East 900 South, Suite 102 • Salt Lake City, Utah 84111 • (801) 363-9621

Response to Letter 20

20.1 BLM recognizes its responsibility to protect natural resources on public lands but at the same time acknowledges the appropriateness of certain recreational uses on these lands, such as ORV use.

See Response 19.1, 2nd paragraph for a discussion of ORV designations.

20.2 Wilderness is not an issue in the RMP. All related information regarding wilderness suitability or non-suitability is being handled on a statewide basis through the Utah Statewide Wilderness EIS. That extensive document contains detailed information on each WSA. Adequacy of the Statewide Wilderness EIS is not an issue in this RMP.

Comment Letter 20

Statewide Wilderness DRaft Environmental Impact Statement" did not do an adequate job of considering the wilderness issue in the Pony Express RMA, there is a need to include the issue in the Pony Express RMP.

For example, there are two areas in the RMA which recieved wide spread wilderness support both during the May, 1986 wilderness hearings and afterwards during the comment period to August, 1986. These areas are the Silver Island Mountains and Cedar Mountains. Yet, the current DEIS all but ignores the protection of these areas. Instead, under most parts of all the alternatives, these areas are wide open for ORV use.

20.3 (3) The Pony Express RMP DEIS makes a number of references about the importance of ACEC designation, yet fails to properly address these values within the RMA. The inclusion of Appendix 8 almost seems to be an afterthought. We are especially concerned about the public involvement process for ACECs since they are important tools for resource protection. Instead of a detailed review of potential ACECs, the DEIS summarily dismisses complete areas with one or two paragraghs. Considering the controversial nature of ACEC designation, this appears to be a violation of NEPA. This is another example of a significant flaw of the current analysis.

20.4 (4) The DEIS fails to recognize that Salt Lake City and its metropolitan area is a major, nearby population center with citizens who enjoy a variety of recreation pursuits. The DEIS ignores the recreational needs of non-ORV users who need non-motorized areas for hunting, hiking, camping, nature study and other similar activities. Again, the overall DEIS bias towards ORVs is evident throughout the document. The needs of non-ORV users along the Wasatch Front needs to be reviewed. With proper management, the Pony Express RMA could provide a number of exceptional and protected outdoor experiences for non-ORV recreationists.

This lack of consideration of non-ORV users appears to violate FLPMA, especially Section 103(c), Section 202(c)(5) and Section 202(c)(6).

20.5 (5) The DEIS fails to consider the long term damage done by ORVs in the Knolls Area. Instead, the BLM, in its cursory examination of ORV issues in the DEIS, simply seems to imply that the Knolls Area will continue to be a designated ORV sacrifice area. The DEIS should take a very close look at the current situation of the Knolls Area and extrapolate the information presented to the rest of the RMA.

20.6 (6) The DEIS identifies the possibility that hazardous and toxic waste disposal facilities could be located on BLM land, or disposed BLM tracts, within the RMA. Under "Air Quality," however, the DEIS fails to consider the effects of accidental

Response to Letter 20

20.3 The November 21, 1988, Federal Register (page 42141) notice of intent to prepare the Pony Express RMP/EIS included a request for nominations of potential ACECs. In addition a news release to local media dated November 17, 1988, requesting nominations was distributed. Participants at four public scoping workshops were asked to identify any potential ACECs that they would like BLM to consider for the area. No nominations were made from any source.

The RMP Planning Team, the Pony Express Area Manager, and the District Manager went through a detailed procedure in which all subjects identified in Appendix 8 were evaluated for possible ACEC designation. The process involved group and individual evaluation assignments involving many hours of work. The process is documented and available for review at the District Office. The brief statements included in Appendix 8 are backed up by that process.

20.4 Background information on where recreation users come from and activities they prefer in the Resource Area are contained in the Management Situation Analysis (MSA) document. It is located in the Salt Lake District Office and is open for your review, but was not made a part of the RMP because of space considerations.

Currently, the BLM has provided two outstanding mountain ranges to non-ORV users in the North Stansbury Mountains and the North Deep Creek Mountains. Visitor numbers have been low. We do not agree that the management plan is biased towards ORVs.

Regarding ORV designations refer to Response 19.1, 2nd paragraph.

20.5 Knolls has been an area ORV users have used due to adequacy of terrain, and minimal user conflicts over more than a decade. BLM has noted that fewer resources have suffered here than other areas previously used and now restricted: Puddle Valley (antelope), Horseshoe Springs (riparian), Salt Mountain/North Stansbury (crucial deer winter range), Rush Lake (waterfowl/riparian) and more. We do not consider Knolls a sacrifice area because our analysis shows only minimal resource conflict.

A Recreation Area Management Plan is being prepared for the area which addresses soil and vegetation impacts associated with ORV use. (Note the amount of mud flats and sand dunes that are void of vegetation in the Knolls area).

20.6 By policy, BLM does not permit hazardous waste facilities on public land as discussed on page 42 in the Draft RMP/EIS. (Also see decision rationale for Hazardous Waste Management.) Analysis of off-site impacts to adjacent BLM lands is a part of the State of Utah's Department of Health and/or EPA's permitting process. BLM has actively been involved and will continue to be involved in these permitting processes. For those facilities located on disposed BLM land, the environmental documentation (such as the Aptus EIS, 1988) does discuss and analyze air quality and accidental spills.

Comment Letter 20

releases of toxic and hazardous substances which could then be carried toward population centers along the Wasatch Front. The DEIS also fails to identify potential liquid leaks which could affect ground water resources in the RMA if hazardous facilities were allowed to be constructed.

20.7 (7) All of the proposed ACECs in Appendix 8 have significant values, especially when considered in relation to the large population of the Wasatch Front. We request that all 21 areas not considered for ACEC designation be reconsidered and recommended for such status. The sites all have either significant archeological, cultural, historical, wildlife or recreational values which need protection now.

20.8 (8) The DEIS fails to identify critical wildlife habitat for small and large animals, including deer, moose and elk, for protection from minerals development, land sales, land trades or ORVs.

20.9 (9) The DEIS fails to identify where, because of the proposed high level of ORV use, how watersheds will be protected.

20.10 (10) The DEIS fails to note how that scenic views along I-80, the principal highway running west of Salt Lake City, should be protected (ACECs are a good start). The management objectives for visual resource protection is inadequate and does not address the protection nor identify the numerous spectacular vistas available from I-80.

20.11 (11) Since the Draft RMP does not provide adequate protection for numerous resources in the RA, the overall range of alternatives do not represent balanced use of public lands.

20.12 (12) Because of interest in the Silver Island Mountains, an ACEC study should be conducted. Such a study would find important recreational, scenic and natural reasons for ACEC designation.

Conclusions

We believe that the draft EIS for the Pony Express RMP is fatally flawed and should, therefore, be reissued, fully incorporating the wilderness suitability issue and properly comparing and analyzing its relation to all other resource values, issues and conflicts.

In addition, other flaws include the elimination of preliminary ACEC's in the DEIS' appendix 8. This appears to be the first public notice of this important and controversial decision. We believe that this is a violation of NEPA.

Overall, the range of alternatives is completely inadequate. We hope the BLM will redo the DEIS so that the controversy over the

Response to Letter 20

20.7 A potential ACEC must meet both the relevance and importance criteria (43 CFR 1610.7-2) to become eligible for further consideration. While all areas of public lands have resource values, not all meet these two criteria. Such lands can be dismissed from further consideration.

Proximity to a population is not a decisive factor in ACEC designation.

Additional information you have on significant archeological, cultural, historical, wildlife or recreational values would be appreciated.

20.8 The term critical habitat is use when referring to a threatened or endangered species. Crucial habitat is a term used with all other species of wildlife.

Crucial habitats were discussed in Chapter 3, Affected Environment. Environmental Consequences in reference to crucial/critical habitats were discussed in Chapter 4. In the planning process crucial wildlife habitat for antelope, deer, moose and elk were taken into consideration in determining land actions, ORV use and minerals development.

See Table 8 in this document for ORV designations in relationship to crucial wildlife ranges. Also refer to Figure 7 in this document for an ORV designation map in conjunction with crucial wildlife habitat maps Figures 3-3, 3-4, and 3-5 in the Draft RMP/EIS. Critical/crucial habitat for bald eagle and other raptors was also taken into consideration.

See Table 5 in this document for fluid mineral leasing in relationship to crucial wildlife ranges. Also refer to Figure 5 in this document for fluid mineral leasing categories in conjunction with crucial wildlife habitat maps Figures 3-3, 3-4, and 3-5 in the Draft RMP/EIS. Critical/crucial habitat for bald eagle and other raptors was also taken into consideration.

20.9 Please refer to Response 20.1.

20.10 Scenic values along I-80 are recognized by BLM and are managed by visual resource management objectives for Class IV.

20.11 We are unable to respond without knowing which "numerous resources" you feel are provided inadequate protection and what you would define as "adequate protection."

20.12 Recreation is spread along a spectrum of interests from primitive to urban recreational opportunities and experiences. The interest in the Silver Mountains near the Nevada border has been expressed by a select few who mainly access the mountain range around the base on the county road. A team of resource specialists had reviewed all public lands in the Resource Area for potential ACEC designation. An ACEC was not considered because the Silver Island Mountains and associated resources did not fit the required relevance and importance criteria; however, due to their proximity to the unique Bonneville Salt Flats, the visual resource management class is designated at a higher level to protect scenic values.

Comment Letter 20

San Juan RMP does not have to be repeated.

The Sierra Club will not allow the Pony Express RMA to become an ORV sacrifice area for Utah. There are many natural values which need to be protected in the area, but which the BLM seems to have completely ignored in its analysis. Again, we urge the BLM to redo and reissue the DEIS for the Pony Express RMA.

Sincerely,

Rudy Lukez,
Conservation Chair
Utah Chapter Sierra Club
P.O. Box 520242
Salt Lake City, UT 84152

Comment Letter 21

Tooele County
Industrial Development
Corporation

August 11, 1988

Mr. Howard Hedrick
Pony Express Resource Area Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr. Hedrick,

Herein are written comments that the Tooele County Economic Development Corp. would like to have considered in the formulation of a responsible, practical plan for the management of 2 million acres of public land in the west desert. As an organization charged with the responsibility of stimulating and sustaining growth in the economy of Tooele County, the Tooele County Economic Development Corporation has a keen interest in the implications of such a resource management plan for future expansion and diversification of the county's industrial base.

21.1 Tooele County Economic Development Corporation strongly supports and recommends alternative #3 with the exception of increased ORV use on land now leased for commercial mineral extraction. The possible adverse consequences of increased acreage open to ORV use include:

1. Possible threat to life and property.
2. Disruption of evaporative processes critical to mineral extraction operations.
3. Protection of existing and future commercial facilities.

Thank you for the opportunity to review the Draft Pony Express Resource Management Plan and EIS. It is hoped that these comments will have utility in the preparation and adoption of a final plan for management of this valuable public resource.

Sincerely,

Earl Tate
Chairman of the Board
Tooele County Economic Development Corporation

SM/cb

cc: TCEDC file
L. Brown

P.O. Box 176 • Tooele, Utah 84074-0176 • 801-882-1894

Response to Letter 21

21.1 Your comments are appreciated. BLM has selected Alternative 2 because the decisions for resource management in this alternative are balanced and are consistent with BLM's multiple-use mandates.

Comment Letter 22

STATE OF UTAH
OFFICE OF THE GOVERNOR
SALT LAKE CITY
84114

NORMAN H. BANGERTER
GOVERNOR

August 11, 1988

Mr. Howard Hedrick
Pony Express Resource Area Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr. Hedrick:

The State, through its Resource Development Coordinating Committee, has reviewed the Draft Pony Express Resource Management Plan and Environmental Impact Statement. Before presentation of the Committee's comments, I would first of all like to thank you and your staff for making the extra effort to expose the Committee first hand to the Resource Area and its management problems and successes through the field trip you sponsored last June. The Committee found the Resource Area to contain a surprisingly varied resource base. This Draft Plan represents a critical step towards thoughtful, balanced management of those complex systems. The State has appreciated the efforts of the BLM to involve it in all stages of the planning process.

The State supports adoption of the BLM's preferred Alternative 2 with minor adjustments. Those recommended changes are delineated below. Additional technical comments on the document are provided thereafter.

I. Comments Relative to Alternative 2

22.1 Page 21, Table 2-1, Parcel Number 2: We have no known problems with disposing of this parcel. However, cliff areas within the parcel have potential for nesting raptors and we recommend a raptor survey of the area be conducted prior to disposal to determine the presence or absence of raptor nests.

22.2 Page 26, Table 2-1, Parcel Number 31: This parcel of land is located within sage grouse nesting, brooding and winter habitat. There is an active strutting ground located within Section 31, T. 6 S., R. 5 W. We would not be opposed to the proposed disposal provided the BLM land is exchanged for

Response Letter 22

22.1 Parcel 2 is presently under R&PP lease to the city of Wendover. It serves as a landfill for the community. It is BLM policy to dispose of sanitary landfills under R&PP to the lessee. BLM has reviewed the parcel's topography and found no cliffs. Therefore, it would not be suitable for nesting raptors.

All parcels that were identified for disposal were the result of a coordinated planning effort between the UDWR and BLM, including a two-day field trip to review the lands in question. BLM's preferred alternative reflected the recommendations made by UDWR at that time. If your present concerns regarding disposal had been identified, they would have been incorporated into the plan.

22.2 Parcel 31, due to the 1984 MFP decision, is already in the process of being disposed. Ten acres are presently under an R&PP lease to Rush Valley for a landfill. During August of 1983, BLM conducted a field investigation with UDWR and the U.S. Fish and Wildlife Service. The investigation found that these acres were marginal sage grouse habitat and that disposal would not impact the population.

Comment Letter 22

Page Two
Mr. Howard Hedrick

private land in Section 27 (west of Highway 36), 28 and 30, T. 6 S., R. 5 W. or Sections 26 and 35, T. 6 S., R. 6 W. in an effort to attain a solid block of BLM land for management purposes. Otherwise we would be opposed to disposal of this parcel.

22.3 Page 26, Table 2-1, Parcel Numbers 35, 36 and 37: These parcels of land are located within historical sage grouse winter, nesting and brooding habitat. There is a sage grouse strutting ground located in the SW1/4 of Section 30, T. 4 S., R. 5 W. which was inactive during the period from 1974 through 1986. However, there has been sage grouse breeding activity observed on the strutting ground the last two years and sage grouse have been observed periodically in the last few years from there north to the area west of the Tooele Ordnance Depot. Based on the recent breeding activity and bird sightings in the area, we recommend these parcels be retained in public ownership in an effort to maintain and improve the existing sage grouse population.

22.4 Page 27, Table 2-1, Parcel Number 53: We recommend retention of Parcel 53 in public ownership. It is located on the Oquirrh Mountains which comprise the Heaston Deer and Elk Herd Units. Public land is extremely limited in this area making big game management extremely difficult. If we hope to maintain big game populations in this area, it is imperative that we retain all existing public land in public ownership.

22.5 Page 28, Table 2-1, Parcel Number 69: All of Section 7, T. 6 S., R. 2 W., west of Highway 73 has been identified as critical value deer winter habitat. As such, we recommend this parcel be retained in public ownership.

22.6 Page 28, Table 2-1, Parcel Number 84: This parcel is located on the east end of Provo Bay and consists of important wetlands habitat. We recommend it be retained in public ownership.

22.7 Page 29, Table 2-1, Parcel Number 94: This parcel is located southeast of Thistle near UDWR property and constitutes high priority value big game winter habitat. We recommend it be retained in public ownership.

22.8 Page 29, Table 2-1, Parcel Number 95: This parcel is located northwest of Indianola and borders UDWR property. It is critical value deer winter habitat. We recommend it be retained in public ownership.

22.9 Page 29, Table 2-1, Parcel Number 98: This parcel is critical value elk winter habitat and high priority value deer winter habitat. We recommend they be retained in public ownership.

Page 30, Table 2-1, Parcel Numbers 107 and 109: These parcels are located in Parley's Canyon and constitute critical value deer and elk winter habitat. We concur in the recommendation that they be disposed of to either Salt Lake City or the Forest Service.

Response Letter 22

22.3 Parcel 35 is already classified as suitable for Desert Land Entry. Wells are being drilled by the applicant to develop a reliable water source for irrigation.

Because of the recent sightings of sage grouse within the vicinity, Parcels 36 and 37 are not identified for disposal in the proposed RMP. They will be maintained in public ownership for future sage grouse habitat use and improvement as the opportunity and need arise.

22.4 Parcel 53 is within the Mercur mining area; much of the land surface is already disturbed by mining activities. Further, due to the broken land patterns, this land is extremely difficult to manage for wildlife, particularly big game such as deer and elk, and has essentially no value for wildlife. For these reasons, this parcel is identified for disposal to adjacent landowners and mining claimants. The loss of this habitat is unfortunate but inevitable with such mining operations.

22.5 Tract 69 is presently under R&PP lease to Cedar Fort. It serves as a landfill for the community. See Response 22.1.

22.6 Disposal of Tract 84 is not in the Proposed Plan. It was erroneously placed on the disposal map for Alternative 2 in the Draft RMP.

22.7 Tracts 94 and 95 have been dropped from the list of parcels in the proposed RMP to reflect your concern about loss of wildlife habitat.

22.8 See Response 22.7.

22.9 Tract 98 is listed for disposal to Forest Service. It will therefore be retained in Federal ownership.

Comment Letter 22

Page Three
Mr. Howard Hedrick

Page 30, Table 2-1, Parcel Number 108: This parcel is located north of Parley's Canyon along the Wasatch Front and is critical value deer and elk winter habitat. We concur in the recommendation that they be disposed of to either Salt Lake City or the Forest Service.

II. Additional Technical Comments

22.10 Page 21-22, Table 2-1: The following lands identified in Table 2-1 for disposal are (according to Indemnity List 324), state lands.

Parcel 9

T1S R16W
Section 19, Lots 1-4: E2W2E2
Section 20, All
Section 27, W2
Section 28, All
Section 29, All
Section 30, Lots 1-4: E2W2, E2
Section 31, Lots 1-4: E2W2, E2
Section 33, All
Section 34, W2

T2S, R16W
Section 3, Lots 1-4:. S2N2, S2
Section 4, Lots 1-4: S2N2, S2
Section 5, Lots 1-4: SW4, S2NW4
Section 6, Lots 1-7: E2SW4, SE4NW4, S2NE4, SE4
Section 7, Lots 1-4: E2W2, E2
Section 8, W2
Section 9, N2
Section 10, N2
Section 17, W2
Section 18, Lots 1-4, E2W2, E2

These changes should also be reflected on the ownership map.

22.11 Page 11, Paragraph 2: Figure B shows land status and not Figure A as stated.

22.12 Page 50, Paragraph 2: Figure 2-5 referred to should be Figure 2-3.

22.13 Page 56, Fire Management, Objective (2): 400-500 acres may be a more reasonable target.

Response Letter 22

22.10 These lands are State lands and have been taken off the list. Since Parcel 9 is not in the Proposed Plan, the new legal description will not be printed in this document.

22.11 The map labels were incorrect. The land status map should read Figure A and Grazing Allotments should read Figure B.

22.12 A change has been made. See Revisions and Corrections for page 50.

22.13 In recent years we have initiated an aggressive program to limit the number of acres burned on public lands in the Salt Lake District. The key feature of this new program is the effective use of green stripping. Green stripping is a method of planting fire-resistant species in wide strips to act as natural firebreaks. These strips are usually located in areas of high fire occurrence and are situated near a road or other natural break. This tool helps to slow or impede the rate of wildfire spread until initial attack forces arrive. In conjunction with black lining, use of a small agricultural spray plane for fire retardant and a 3,000 gallon water tanker has improved our fire suppression capabilities. Limiting wildfires in the sagebrush-grass community to no more than 300 acres is a realistic and attainable objective.

Comment Letter 22

Page Four
Mr. Howard Hedrick

22.14 Page 59, Vegetation Management: The Summary, Description of the Alternatives and Table 2-8 all list different numbers for AUM livestock allocations. For example, under Alternative 2, the Summary indicates that 2,487 AUMs would be made available; whereas, the Description of the Alternatives section allocates 2,327 AUMs to livestock and Table 2-8 lists 2,627 AUMs.

22.15 Page 71, Paragraph 1: Figure B shows land status rather than Figure A as stated.

22.16 Page 72, Paragraph 1: Figure A referred to should be Figure B.

22.17 Page 73, First Sentence: The document states that "Most of the Pony Express Resource Area is under oil and gas lease." This statement appears to be in error. While it may have been true a number of years ago, we question its validity today.

22.18 Page 84, Paragraph 11: Grazing allotment boundaries are outlined in Figure A rather than Figure B as stated.

22.19 Page 99, Paragraph 3: With the exception of years 1955 through 1957 and 1970, an annual restricted harvest has occurred since at least 1951.

22.20 Page 99, Paragraph 5: A total of 374 antelope were observed in the Puddle Valley Antelope Unit during the 1988 UDWR aerial census conducted on February 26, 1988.

22.21 Page 99, Paragraph 7: A total of 287 antelope were observed in the Tooele County portion of the Snake Valley Antelope Unit during the 1988 UDWR aerial census.

22.22 Page 99, Paragraph 9: An additional 63 animals were re-introduced in late 1987 rather than 75 as stated.

22.23 Page 100, Paragraph 2: Figure 3-5 referred to should show additional sage grouse crucial habitat along the Tooele-Juab County line on the southeast side of the Sheeprock Mountains.

22.24 Page 100, Paragraph 6: The shorebirds listed, with the exception of the Canada goose which is not a shorebird, are actually colonial nesting waders. Shorebirds should include stilt, avocet, phalarope, dowitcher, etc.

22.25 Page 100, Paragraph 7: The marsh hawk should be listed as Northern harrier. Additional raptor species should include goshawk, Merlin and rough-legged hawk.

22.26 Page 101, Paragraph 2: There are 10 streams in Tooele County that presently support fish. They include Blue Creek draining out of Blue Lake; Deep Creek north and south of Ibapah; North and South Willow Creeks on the

Response Letter 22

22.14 The correct figures for the livestock allocations for each alternative after proposed allotment eliminations and lands disposals are as follows:

Alternative 1....................	1,890 AUMs
Alternative 2....................	2,315 AUMs
Alternative 3....................	2,333 AUMs
Alternative 4....................	2,410 AUMs

This includes both sheep and cattle AUMs. Appropriate changes will be made to the Summary, Description of the Alternatives, Table 2-8 and Appendix 6B. See Revisions and Corrections for Appendix 6C and 6D (pages 185, and 186).

22.15 Refer to Response 22.13.

22.16 Refer to Response 22.13.

22.17 The change has been made. See Revisions and Corrections for page 73.

22.18 Refer to Reponse 22.13.

22.19 The change has been made. See Revisions and Corrections for page 99.

22.20 The change has been made. See Revisions and Corrections for page 99.

22.21 The change has been made. See Revisions and Corrections for page 99.

22.22 The change has been made. See Revisions and Corrections for page 99.

22.23 Our available data did not show sage grouse crucial habitat in that area, so it was not included in the text or on the map.

22.24 The change has been made. See Revisions and Corrections for page 100.

22.25 The change has been made. See Revisions and Corrections for page 100.

22.26 The change has been made. See Revisions and Corrections for page 101.

Comment Letter 22

east slopes of the Stansbury Mountains; Clover Creek in the Clover area; Barlow and Indian-Hickman Creeks on the west slopes of the Stansbury Mountains; and Vernon, Little Valley and Bennion Creeks on the Sheeprock Mountains. A majority of these streams are not located on BLM lands; however, at least four (Deep Creek, Clover Creek, Barlow Creek and Indian-Hickman Creek) are located partially on BLM lands. Known fish species present in the above four streams are as follows:

Deep Creek - Rainbow trout, German brown trout, speckled dace and mountain sucker.

Clover Creek - Rainbow trout and German brown trout.

Barlow Creek - Rainbow trout.

Indian-Hickman Creek - Rainbow trout hybrid.

Additionally, Ophir and Harker Creeks are currently being surveyed with intentions of introducing Bonneville cutthroat trout in both if found suitable.

22.27 Page 101, Paragraph 6: Kanaka Lake and Clear Lake located in Skull Valley are also classified Class 3 fishing waters. Kanaka Lake contains largemouth bass, carp and mosquito fish and Clear Lake contains largemouth bass and carp. Blue Lake in extreme western Tooele County, although not located on BLM land, is also classified a Class 3 fishing water and contains largemouth bass, bluegill, carp and mosquito fish. Attempts are also being made by UDWR to establish a warm water fishery in Rush Lake, located near Stockton, Utah, where largemouth bass, bluegill, yellow perch and channel catfish have been stocked.

22.28 Page 101, Paragraph 9: An additional major furbearer present in the Resource Area is the bobcat.

22.29 Page 101, Paragraph 11: Seventy-one percent seems high to us and may bear double checking.

22.30 Page 101, Paragraph 12: This paragraph dealing with the peregrine falcon needs to be clarified and rewritten.

22.31 Page 102, Paragraph 1: We suggest rewording the second sentence as follows:
A hacking tower was constructed in the Timpie Springs area and fledgling peregrine falcons were released in 1983, 1984, 1985 and 1986. In 1987, a pair of adult peregrine occupied the tower. In 1988 the first successful young peregrine was naturally raised by the nesting pair.

22.32 Page 113, Environmental Consequences: Although fisheries are limited on BLM lands within the Resource Area, there are some present (Deep Creek, Clover Creek, Barlow Creek, Indian-Hickman Creek, Horseshoe Springs, Clear Lake,

Response Letter 22

22.27 Kanaka and Clear Lake are on private land, so they were not described in the document.

22.28 The change has been made. See Revisions and Corrections for page 101.

22.29 The study conducted by Joseph B. Platt of Brigham Young University, Department of Zoology discussed the occurrence of lead shot in bald eagle pellet analysis. He notes that "a more significant food source was indicated during the analysis of pellets from the Rush Valley roost...Lead shot from shotgun shells was found in seventy-one percent of the pellets." Source: Platt, Joseph B., "Bald Eagles Wintering in a Utah Desert," American Birds, National Audubon Society, August 1976, Vol. 30, No. 4, pp. 783-788.

22.30 See Comment Response 7.6.

22.31 The change has been made. See Revisions and Corrections for page 102.

22.32 The limited fisheries on public land would not be significantly affected by the Proposed Plan. No riparian/aquatic habitats will be disposed under the Proposed Plan.

Riparian/aquatic habitats will be protected by restricting seismic work, well development, new road construction, rights-of-way, organized recreational activities, military exercises and other disturbing activities within 1,200 feet of riparian/aquatic habitats. Further protection is provided by special stipulations for fluid mineral leasing.

Through the Habitat Management Plan (HMP) development, fish and wildlife habit will continue to be evaluated on a case-by-case basis. Those bodies of water/stream that support fisheries within an HMP area will be given consideration for maintenance/improvement and/or reintroduction or habitat expansion for adapted fish species. It is recognized that good riparian habitat management does not always equate to good fisheries habitat management. Therefore, it is necessary to review these streams not only for riparian habitat condition but also fisheries habitat condition.

Finally, selected perennial streams will be monitored for water quality trend to insure that management activities on public lands comply with existing State water quality standards. All four creeks, Clover, Indian-Hickman, Deep and Barlow, are classified (3A) for cold water fisheries/habitat and (4) for irrigation water supply. BLM will manage areas, wetlands, and other water sources for multiple-use purposes such as wildlife, range, watershed and recreation.

Those portions of Rush Lake on public land will be managed as a wetland over the long-term due to the periodical fluctuation of the lake water level.

Kanaka and Clear Lakes occur on private land. Indian-Hickman and Clover Creeks do not occur on BLM administered lands. They cross Forest Service, private and Skull Valley Indian Reservation. Deep Creek and Barlow Creek cross BLM administered lands; however, the water quality and quantity of these streams for fisheries, by the time they enter BLM lands, are questionable and warrant further investigation during the HMP development process. Information available from the UDWR would be appreciated.

Comment Letter 22

Kanaka Lake, Rush Lake, etc.) and should be discussed accordingly. We could find no such discussion.

22.33 Page 126, Paragraph 10: As noted earlier in reference to disposal of Parcel 31, some recent activity has been noted on the strutting ground and sage grouse still persist in the area.

Fold-Out and Pocket Maps

22.34 Figure 2-7, Disposal Tracts under Alternative 1: Parcel 9 is not accurate--see IL 324.

22.35 Figure 2-10, Fluid Mineral Leasing Categories, Alternative 1: Category 2 stipulations appear to be covering a portion of the bed of Utah Lake which is state sovereign land. Also T2S, R7W, Section 16, is state land.

22.36 Figure 2-17, Disposal Tracts under Alternative 3: Parcel 9 is not accurate--see IL 324.

22.37 Figures 2-7, 2-11, 2-17, Disposal Tracts for Alternatives 1, 2 and 3: It would have been helpful to include land ownership status on these maps to aid in establishing the relationship between those tracts being recommended for disposal and ownership of surrounding land. This would include distinguishing BLM from Forest Service managed lands.

22.38 Pocket Map: Some parcels of public lands did not appear on the map, e.g., Parcels 94 or 95.

Please note that the Division of State History sent their comments on the Draft Plan under separate cover. Thank you for the opportunity to comment.

Sincerely,

Norman H. Bangerter

Norman H. Bangerter
Governor

NHB/mec

Response Letter 22

22.33 Refer to response to Comment 22.2.

22.34 The map is incorrect. The legal description in Table 2.1 is correct. This parcel is not in the Proposed Plan, so the map has been corrected in this document.

22.35 BLM fluid mineral designations do not apply to State lands.

22.36 The map is incorrect. The legal description in Table 2.1 is correct. This parcel is not in the Proposed Plan, so the map has not been corrected in the document.

22.37 A land status map located in the back cover of the document was provided to help distinguish ownership for the other maps. We regret any confusion over landownership status.

22.38 Some isolated parcels that are 40 acres or less, as are Parcels 94 and 95, were inadvertently left off the land status map. These areas should have been included as public surface. However, these parcels are no longer proposed for disposal. (See Response 27.7.)

Comment Letter 23

UTAH NATURE STUDY SOCIETY

721 Second Avenue
Salt Lake City
Utah 84103

August 10, 1988

Mr. Howard Hedrick
Pony Express Resource Area Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr Hedrick:

Comments concerning the Draft Pony Express Resource Managment Plan and Environmental Impact Statement:

23.1 Page 2: What private lands would be acquired at Rush Lake and would this include the appropriate water rights?

23.2 Page 13: Table 1-1. Utah County land ownerships percents do not add up to a 100%.

23.3 Page 41: Horseshoe Springs and Rush Lake should also be considered for land, mineral, oil and gas leasing, and water rights withdrawal.

23.4 Page 43: Should not the Forest Service also be involved with water management?

23.5 Page 44: Perhaps a second column should be added to denote actual animal numbers. The wild animals are present all seasons. Are the livestock also present all season?

23.6 Page 47: Will the introduction of bighorn sheep cause any species to become threatened or endangered?

23.7 Page 47: BLM should also restrict unorganized recreation in protection of important wildlife habitat- expeciall within 1200 feet of riparian/aquatic habitats. Unorganized recreation is more likely to leave tracks in riparian areas.

23.8 Page 48: Should not the BLM conduct a biological survey of its wetlands to make sure aquatic improvements will not endanger or threaten any of the localized species. Note that Fish Springs National Wildlife Refuge is blamed for the extinction of a gastropod.

23.9 Page 49: Knolls Off-road vehicle area special RMA should be inventoried for unique species of plants and animals before the dedication of such lands to the highly destructive usage. Will ORV activities cause any species to become threatened or extinct?

Response to Letter 23

23.1 A legal description of the private lands that BLM wishes to acquire at Rush Lake is outlined on page 54 of the Draft RMP/EIS and in the Proposed Plan. This acquisition would include appropriate water rights.

23.2 The table has been corrected. See Revisions and Corrections for page 13.

23.3 Both Horseshoe Springs and Rush Lake provide important habitat to over 100 species of waterfowl and shorebirds. The open waters and associated wetlands provide resting, feeding, and nesting areas to many birds and mammals. Retention of these areas in public ownership is a significant part of our habitat management program. Because of their importance, these areas have been identified as lands not available for ownership adjustment (see Table 4 in the Proposed Plan). BLM has taken other precautions to protect this wildlife habitat. Specifically, all surface disturbing activities such as seismic work, well development, and new road construction are prohibited within 1,200 feet of riparian and aquatic habitats. We are confident that this measure will provide adequate protection to not only Horseshoe Springs and Rush Lake, but to all important wetland and riparian areas.

23.4 It is true that the Forest Service is involved with the management of many watersheds in Tooele County and that their actions affect water quality and quantity on BLM administered lands; however, BLM's coordination with adjacent landowners is not limited to the Forest Service, but includes private landowners, the State of Utah, two Indian reservations, and the Department of Defense. This specific statement, however, refers to those agencies which are directly involved with the management of waters on BLM-administered lands.

23.5 Seasons-of-use for Tooele County allotments are given in Appendix 2 (page 85) of the Tooele Grazing EIS and Table 3-6 (page 86) of the Draft Pony Express RMP for Utah County allotments. As these tables indicate, livestock use BLM land in the Pony Express Resource Area during all times of the year. However, at this time no allotments have yearlong livestock use. Some permittees hold grazing permits for several allotments which allow livestock to move to the next allotment, extending the time they use BLM land. In some cases, this may result in livestock being permitted on BLM land for the entire year in one allotment or another. For this reason, numbers of livestock cannot be used for analytical purposes and instead animal unit months (AUMs) are used. In this way, the length of time livestock use BLM land is taken into consideration.

23.6 The "introduction" of bighorn sheep is actually a reintroduction of a species in a historic range. To our knowledge, this reintroduction will not cause any species to become endangered or threatened. Further, since this is a reintroduction and an equilibrium had once been reached, it will again be reached and maintained between all species including those threatened and endangered.

23.7 If BLM were to restrict unorganized recreation to protect riparian and aquatic habitats, all forms of use such as environmental study, fishing and hunting would be totally eliminated. Leaving tracks (footsteps) is not an act that seriously impairs the resources of these sites. Diversified recreation (non-motorized) is a legitimate use of such areas.

Regarding ORV designations, refer to Comment 19.1, 2nd paragraph.

Comment Letter 23

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23.10 Table 2-8: Why is not Horseshoe Srpings an ACEC designation in Alternative 4?

23.11 Page 106: Water sking, motor boating and windsurfing should be restricted on Rush Lake from probhition during waterfowl nesting season (March to July 1) and during fall migration (September through November) to regulation as to motor size and speed the remainder of the year.

23.12 Page 113: Analysis assumptions implies that no species of plant or animal will become extinct or threatened. Since biological surveys are not being proposed and since Great Basin is a region of a high number of endemic species or species of high scientific values (Giant Stonefly), more species will become extinct unless there is better knowledge of the plants and animals, their life histories, and their distribution.

23.13 Page 114: Analysis of the cheatgrass-fire is excellent. We have long noted the disappearance of desert shrub by the increasingly larger areas of cheat grass due to fires- especially on the west side of the Cedar Mountains. The Resource Management Plan should address the efforts to control cheat grass to break this cycle.

23.14 Page 115: Since sheep grazing can increase perennial grass production which enhances retention of soil and water, would not cattle which consume perennial grass therefore contribute to loss of soil and water? What plans exists which sheep grazing allotments will be converted to cattle grazing allotments?

23.15 Page 116: Cattle grazing also, along with ORV and fluid mineral activities increase sediment and bank erosion.

23.16 Page 118: Fire suppression may also destroy native ecosystems which contain threatened and endangered species by preventing the destruction of competing plants. For instance, rabbitbrush survives fire and sagebrush is killed. Fire suppression encourages therefore sagebrush whereas fires encourage rabbitbrush. One must know the ecological requirements of the threatened or endangered species before using fire suppression techniques to "save" these species.

23.17 Page 140: It seems that the decision for Issue 1 is to make I-80 an industial corridor. This drive between Salt Lake City and Wendover use to be very unique for North America as well as for Europe. The experiences of the Bonneville Basin and the salt flats have been eroded away by past BLM and State and Tooele County decisons. This erosional processes will continue with the solutions to Issue 1.

23.18 Page 140: Both Rush Lake and Horseshoe Springs hsould be unsuitable for mineral exploration and development and should be placed in category 4 for oil and gas leasing.

23.19 Page 151: Pleistocene history needs revision. 1) Lake Bonneville was formed by increased precipitation and not from melting glaciers. 2) Lake Bonneville occurred in its latest episode from 26,000 years ago to 13,000 years ago. 3) The giant stonefly distribution suggest ancient aquatic connections between the Deep Creeks and the west coast mountains. However such connections may have occurred in the Pliocene era and not in the Pleistocene era. Such

Response to Letter 23

23.8 Aquatic and all other improvements are subject to an environmental analysis process to ensure that the BLM will not endanger or threaten any of the local species. These processes include notifying Fish and Wildlife Service if there is a "may effect" scenario for any threatened and endangered species. It is the Fish and Wildlife Service's responsibility to determine if the proposed improvement will affect threatened and endangered species. Then BLM can make adjustments accordingly to mitigate or deny construction of the proposed project.

23.9 Knolls off-road vehicle area has been used by off-road vehicle enthusiasts for over 10 years. It has become popular and intensively used in the last 3 years. The Special RMA is an in-house designation that helps prioritize the funding for improvements (such as facilities, signing, etc.) and protection of areas within the RMA. This "dedication" does not mean that we are taking an area that is presently free from off-road use and promoting intensive use. In the case of Knolls the use has occurred in the past and present.

Further, the area has been surveyed and there are no known threatened and endangered species. The habitat (i.e. soils, climate, microclame) does not lead us to believe that there is a potential for threatened and endangered species at Knolls off-road vehicle area.

23.10 New ACEC proposals (i.e. those not previously designated or recommended in the Tooele Management Framework Plan) were included in Alternative 2 only.

23.11 BLM does not have jurisdiction over the body of water at Rush Lake. The lake itself is managed by the State of Utah, Department of Parks and Recreation. BLM does, however, restrict off-road vehicles around the perimeter of the lake on public lands (see Table 8 in this document).

Motorized vehicle use at Rush Lake is limited to existing roads from July 16 through March 31. The area is closed to motorized vehicle use from April 1 through July 15. Rush Lake is used intensively by waterfowl and shorebirds for breeding and nesting. Vehicle use on the marshy soils could damage habitat, nests, and disturb birds during the critical stages of their life cycles.

23.12 Any activity proposed on public land will be analyzed through the Environmental Assessment or Environmental Impact Statement process. Impacts to all resources will be analyzed. BLM is mandated to protect and preserve species that are threatened or endangered.

23.13 In recent years a major objective of the Emergency Fire Rehabilitation (EFR) plans completed on the Pony Express Resource Area has been to break the cycle of repeated fires in the cheatgrass type. This is done with the mechanical planting of species that stay green longer or throughout the summer and/or compete with the cheatgrass, reducing its density and wildfire potential. As this can be quite costly and potential for successful establishment is very low on these desert sites, seeding is often done in 80- to 100-foot strips. These green strips are established to slow the advance of wildfires. The final result is reduced fire size and occurrence and improved establishment of native desert shrub species through natural revegetation.

Small plantings of native shrubs and grasses are also being attempted to supply a seed source in these large, cheatgrass-dominated areas. Again, cost is restrictive and establishment is difficult.

Comment Letter 23

connections may not have been continuous, but occur over millions of years. None of the Lake Bonnevilles ever flowed into any other region but the Snake River (the last Lake Bonneville) but the Bonneville Basin may once have been connected to the Colorado River drainage. Enclosed are two figures. Figure 1 is taken from Donald R. Currey and Charles G. Oviatt paper in "Problems of and Prospects for predicting Great Salt Lake Levels" (ed. Paul A. Kay and Henry F. Diaz), Center for Public Affairs and Administration, University of Utah, May 1985) and the Figure 2 is taken from William D. McCoy paper "Quaternary aminostratigraphy of the Bonneville Basin, western United States" in Geological Society of America Bulletin, v. 98, pages 99-112, 1987.

23.20 Page 152: Riverbed-Dugway water course probably was not operative 100,000 years ago (see Figure 2) but was associated with one of the wetter Pleistocene cycles.

Page 151: It seems that the Donner-Reed party was trying to hook up with the Hastings party rather than electing to take the Great Salt Lake route.

23.21 Page 151: Bristlecone pine (Pinus longaeva) is unique to the Great Basin and not just to Utah.

23.22 Page 153. White Rocks archeological sites and the local flora and fauna are also threatened by ORV use and dispersed recreation.

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23.23 In reading the response to Letter 7 in the Final Environmental Impact Statement, Aptus Industrial and Hazardous Waste Treatment Facility (June 1988 by the Salt Lake District Office of the Bureau of Land Management, Response 7-11): "The vegetational communities located at the three alternative sites are not considered unique to the West Desert. Legislation currently protects plant species listed as threatened or endangered or those proposed for listing, according to the Endangered Species Act of 1973. As stated in the Draft EIS, no federal or state-listed threatened, endangerd, or candidate plant species are known to occur with the proposed project areas." , we feel that the uniqueness of the Great Basin is not appreciated by the Resource Managers of the region. One could just as well state that the Deep Creek Mountains are not considered unique to the West Desert for they are like every range in the Basin and Range physiographic region. Likewise the Stonefly of the Deep Creek can be ignored for it is not protected by the Endangered Species Act of 1973. Yet the Basins are like the Ranges in that they are isolated and have long histories and are full of evolutionary processes of new species and relic populations. Utah Nature Study Society strongly urges that all land transactions and new uses be accompanied by a thorough biological survey. Many species, just as unique as the Giant Stonefly and the Bonneville Cutthroat trout and the Bristlecone pine are being eradicated from the Bonneville Basin by processes that have started some 30 years ago. Amphibians (Spotted Frogs, Woodhouse Toad, Western Toad, Leopard Frog where native), reptiles (Collared Lizard), and birds (Snowy Plover) have been greatly restricted or destroyed. Biological Surveys would allow Resource Managers to get a handle on the events and should not be summarily dismissed as areas not unique to the West Desert.

Response to Letter 23

Black lining is also being used to control the size and occurrence of wildfires in the cheatgrass type. In black lining, an 80- to 100-foot strip of cheatgrass is burned along a road early in the summer to again stop or slow the advancement of wildfires. This method has the same benefits as green stripping but must be done on a yearly basis. It promotes the continued domination of cheatgrass along the black line areas.

These and other possible attempts at controlling the cheatgrass wildfire cycle are designed, analyzed and conducting under EFR plans and fire management plans.

Also see Response 22.13.

23.14 Heavy cattle grazing, especially during the spring growth period, can have the same detrimental effects to the watershed as spring grazing by sheep (see page 116 of the Draft RMP). Proper grazing by cattle can occur without adverse effects to the watershed. This is the underlying goal of the allotment management plans and forage allocations for the allotments.

Requests for sheep to cattle conversions will be considered on a case-by-case basis. Policy for such conversions are set forth in BLM Salt Lake District Manual 4120. No conversions are under consideration but they could be proposed any time.

23.15 Impacts of livestock grazing on watershed in Utah County are covered in the Draft RMP/EIS on page 126, Paragraph 8. Impacts in Tooele County are covered in the Tooele Grazing EIS.

23.16 We are not aware of any fire-climax species in the Resource Area which are candidates for threatened and endangered status. In areas of highest fire occurrence, we have noted a gradual loss of the native plant communities and a replacement by predominantly annual plants. Many times these are introduced species. This is especially evident in southern Skull Valley, where reoccurring fires have changed an area from a native brush-grass community to one dominated by cheatgrass, an introduced annual species.

23.17 The lands decisions identified in the Proposed Plan do not call for the actions listed on page 140. See Figure 1 for proposed disposals.

23.18 Through our analysis we have concluded that the riparian/wetland stipulation prohibiting fluid mineral activity within 1,200 feet of live water adequately protects these resources.

23.19 Your comments to the geology introduction are noted. We acknowledge there are some errors in this introduction, however, since it has no bearing on impact analysis or the Proposed Plan, no change will be made in the text.

23.20 Your comment is correct. The text should have read "10,000" years ago. See Revisions and Corrections for Page 152.

23.21 A change has been made. See Revisions and Corrections for page 151.

23.22 Regarding ORV designations, refer to Comment 19.1, 2nd paragraph.

Comment Letter 23

-4-

Skull Valley contains two operculated gastropods which have not been found is any other basin (examined Snake, Tule, Rush, Steptoe, Spring, Lake, Railroad, Ruby, Clover, Pilot, and many others). Both species occurs in Horseshoe Springs and each species occurs in some of the other springs in Skull Valley. These species should be identified. Again a biological survey of all wetlands should be made. Certainly a thorough biological survey should be made before any improvements or alterations are made. Each water resource should be considered as unique as the Deep Creek Mountains and other island systems. If the only species that are of interest are the threatened or endangered species or extinct species as recognized by law, many more species will become extinct under the federal protection laws.

Sincerely,

Peter Hovingh, Chairman
Issues Committee
Utah Nature Study Society

Response to Letter 23

23.23 Refer to Comment 23.8.

Further, it is unfortunate that BLM does not have the resources required to do the specialized biological studies which delve deeply into the study of these diverse and rich communities. We do, however, encourage volunteer studies that would support and strengthen the data base of our biological survey. We would welcome any information that you may have available to share or would encourage volunteer or fundraising efforts to support more in-depth scientific study of the unique basins and ranges of the west desert.

Figure 1. Reproduced from Donald R. Currey and Charles G. Oviatt, 1985. "Durations, Average Rates, and Probable Causes of Lake Bonneville Expansions, Stillstands, and Contractions During the Last Deep-Lake Cycle, 32,000 to 10,000 years ago". Pages 9-24. In "Problems of and Prospects for predicting Great Salt Lake Levels, ed. P.A. Kay and H.F. Diaz, published by Center for Public Affairs and Administration, University of Utah.

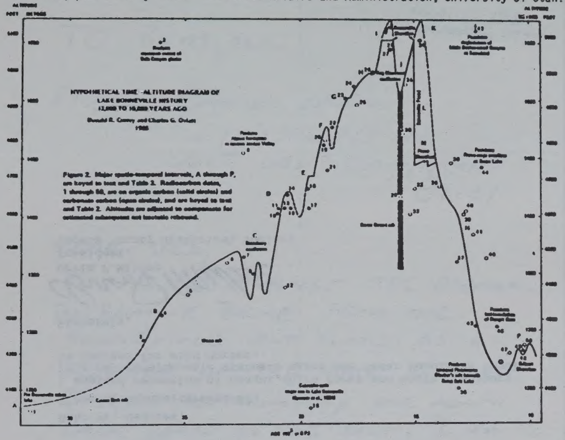


Figure 2. Reproduced from William D. McCoy, 1987. "Quaternary aminostratigraphy of the Bonneville Basin, western United States. Geological Society of America Bulletin, Vol. 98: pages 99-112.

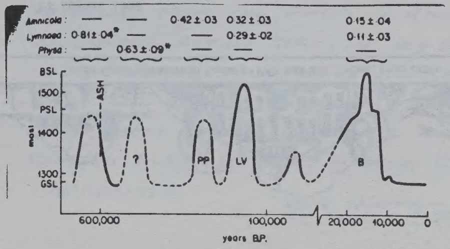


Figure 7. Summary diagram of the fluctuations of Lake Bonneville with mean alle/Ile ratios from each aminostratigraphic unit (line dashed where uncertain).

Comment Letter 24

Tooele County Historical Society • P.O. Box 327, Tooele, Utah 84074 • 882-2345

13 August 1988

Mr.Howard Hedrick
Pony Express Resource Area Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City,Utah 84119

Dear Mr. Hedrick,

I concur with alternate #2.

I applaud retention of Onaqui,White Rocks and North Stansbury in a no trade,no sale status.I agree the Cedar Mountains should be managed for wild horses.

Sincerely,

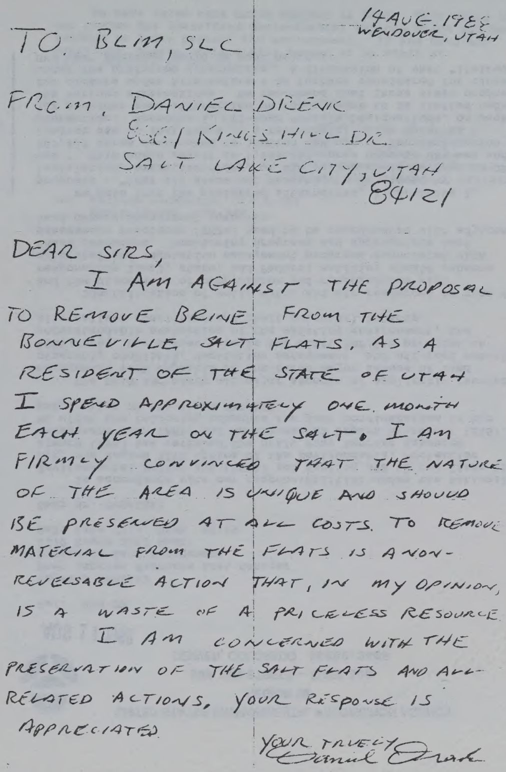
Orrin P Miller

Orrin P.Miller
President,
Tooele County Historical Society

Response to Letter 24

Your comments are appreciated.

Comment Letter 25



14 AUG. 1988
WENDOVER, UTAH

TO: BLM, SLC

FROM: DANIEL DRENK
8661 KINGS HILL DR.
SALT LAKE CITY, UTAH
84121

DEAR SIRS,

I AM AGAINST THE PROPOSAL TO REMOVE BRINE FROM THE BONNEVILLE SALT FLATS. AS A RESIDENT OF THE STATE OF UTAH I SPEND APPROXIMATELY ONE MONTH EACH YEAR ON THE SALT. I AM FIRMLY CONVINCED THAT THE NATURE OF THE AREA IS UNIQUE AND SHOULD BE PRESERVED AT ALL COSTS. TO REMOVE MATERIAL FROM THE FLATS IS A NON-REVERSABLE ACTION THAT, IN MY OPINION, IS A WASTE OF A PRICELESS RESOURCE.

I AM CONCERNED WITH THE PRESERVATION OF THE SALT FLATS AND ALL RELATED ACTIONS, YOUR RESPONSE IS APPRECIATED.

YOUR TRULY,
Daniel Drenk

Response to Letter 25

Your comments are appreciated.

Comment Letter 26

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

AUG 11 1988

Ref: 8PM-EP

Hayward Hedrick
Pony Express Resource Area Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, Utah 84119

Dear Mr. Hedrick:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the Draft Pony Express Resource Management Plan (RMP) and Environmental Impact Statement (EIS). We offer the following comments for your consideration in the preparation of the Final RMP/EIS.

The DEIS addresses all major aspects of applicable resource management with emphasis on the three major issues of land ownership conflicts, vegetation management, and off-road vehicle (ORV) use. Our review reveals the draft RMP/EIS provides an understandable evaluation of the existing environment, the alternatives considered and their potential impacts.

Identification of soil, water and air resources on page 43, and the discussion of cooperation and coordination with responsible local, state, and Federal entities should enhance watershed and vegetation management programs associated with these resources. Monitoring programs and appropriate best management practices (BMPs) need to be coordinated with adjacent land owners/management agencies.

26.1 We note that the preferred alternative, Alternative 2, proposes .."that all areas not mandated to be closed by legislation, executive order, or BLM policy would be open to ORV use." This would result in 1,669,267 acres open to ORV use and 363,439 acres restricted to limited ORV use. The implication of limited use is that there is a resource(s) which deserves protection. Appendix 5, Off-Road Vehicle Designations, on page 182 provides some information on these areas to be limited under the various alternatives. We recommend that those areas proposed for closure under Alternative 4 be further considered for closure under the preferred alternative. A discussion of what "limited ORV use" includes would be most helpful.

Response to Letter 26

26.1 Regarding ORV designations refer to Response 19.1, 2nd paragraph.

Comment Letter 26

2

We have rated this draft RMP/EIS as EC-1. This means that our review has identified environmental impacts which can be avoided to fully protect the environment. If you have any questions, please contact Mike Hammer of my staff at (303) 293-1618 or FTS 564-1618.

Sincerely,

Robert R. DeSpain

Robert R. DeSpain, Chief
Environmental Policy Branch
Policy and Management Division

cc: William Dickerson, OFA A-104
Kerry Clough, ARA 8PM

Comment Letter 27

4575 Canyon Road.
Provo Utah 84604
Aug. 14, 1988.

District Derector
Bureau of Land Management
2370 South 2300 West
Salt Lake City Utah 84119

Dear Sir:

I desire to comment on the proposal to dispose of isolated parcels or tracts of land that are now under B.L.M. management and ownership, But are situated in or adjacent to private grazing land, and are being used in connection with the private land by B.L.M. license or permit.

27.1 In many cases it may be diffecult or almost impossible to operate efficiently and economically if severance of the public land is made, and it is withdrawn, or acqured by someone other than the Present user.

I respectfully suggest that in such cases of disposal, that consideration be given to the Present user, and that he be given the first right of refusal.

Yours truly
Newell A Johnson

Response to Letter 27

27.1 Impacts to the livestock operators resulting from the disposal of public land are a major concern to the BLM. Your comments will be taken into consideration.

Most tracts identified will be available for disposal under all available authorities including sales (see Table 2). The specific type of disposal authority cannot be determined until a proposal is received.

Sales of tracts will be done under a competitive bid process in which adjacent landowners can participate. Decisions on the disposal of individual tracts will be made on a case-by-case basis following criteria given under the proposed decisions. The adjacent landowner may be provided an opportunity to match the high bid on tracts being sold.

Comment Letter 28

TOOELE COUNTY WILDLIFE FEDERATION
"PEOPLE WHO CARE"

Tooele County
Wildlife Federation
BOX 223 TOOELE, UTAH 84074

Mr.Howard Hedrick
Pony Express Resource Area Manager
Bureau of Land Management

August 13, 1988

Dear Mr. Hedrick

After reviewing the Pony EXpress Management Plan & E.I.S. the Tooele County Wildlife Federation and members find we must support Alternative # 4.

28.1 We strongly oppose the sale or trade of the public as indicated in Alt. 1-2-3 most of which is critical wildlife habitat.

Additional funding is needed for wildlife and developement of habitat for wildlife in this area.

28.2 In addition the T. C. W. F. feelsthe B. L. M. should strongly consider a phase out of grazing allotments on the Deep Creek and Stansbury Mountains to protect the Big Horn Sheep from desease transmitted by livestock and domestic sheep.

Sincerely

Gene J. Ekenstam
Gene J. Ekenstam
President of T.C.W.F.

Response to Letter 28

28.1 In Alternative 2, the preferred alternative, none of the BLM administered lands considered crucial or critical wildlife habitat were identified for disposal. However, UDWR has indicated that some of the identified lands are indeed crucial to some wildlife species. Refer to Comments/Responses 22.1 through 22.8

28.2 Grazing in both the Deep Creek and Stansbury Mountains will continue. To our knowledge, no disease transmission problems have occurred between bighorn sheep and livestock in the Deep Creek Mountains. Bighorn sheep have not yet been reintroduced into the Stansbury Mountains. We do however recognize that a potential exists for such a problem; these populations will continue to be monitored by UDWR and BLM.

Comment Letter 29

GEOLOGICAL RESEARCH SERVICE

JOHNSTUN & JOHNSTUN
(801) 942-5188

2121 E. LONSDALE
SALT LAKE CITY, UT 84121

August 15, 1988

To: Howard Hedrick

Dear Howard Hedrick,

In the areas you are making plans to withdraw, my associates and myself must strongly protest your plans, we have spent great research efforts and are now nearing the time to claim and start mining and other activities in the proposed withdrawl area.

29.1 1. We protest closing any public lands for mining and or gas and oil leases.

29.2 2. We not only protest but contest the BLM assertion of "no" gold of commercial value in Tooele, Utah, and Salt Lake counties.

3. We protest such an atrosity on any future mineral extraction in the entire state of Utah as Utah needs the industry.

29.3 4. We not only feel it is illogical but unreasonable to think BLM has to protect the mud flats because it is an "Area of critical environmental concern to protect existing recreation and senic qualaties from potential mining development."

We in the industry wonder why it will "send up a red flag" when the greatest interests on the earth are for man and his survival above recreation and even scenic beauty.

From our research we feel the lands involved in the hearing is a chief source of many elements that can be used to bennefit the State and Nation.

29.4 We also contest the extension of the Goshute Indian Reservation

Response to Letter 29

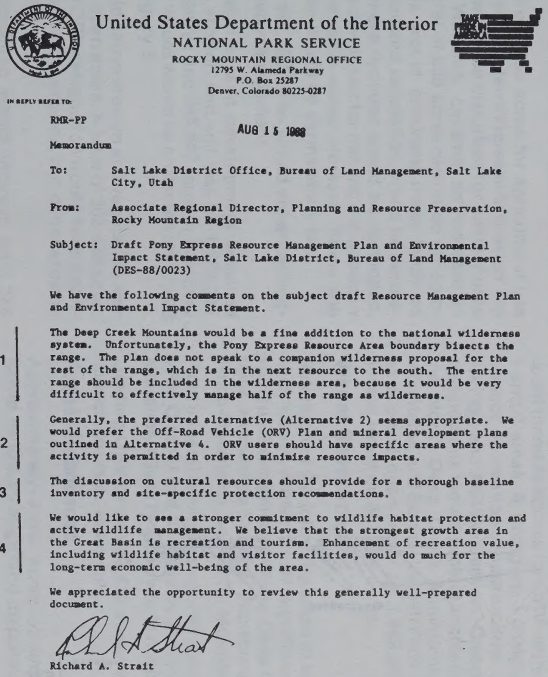
29.1 Figure 2-13 in the Draft RMP depicts the fluid minerals leasing categories for Alternative 2, the preferred alternative. Figure 5 in this document depicts the Proposed Plan. These maps clearly shows that no public lands in the Resource Area are proposed to be closed to fluid mineral leasing. Figure 2-14 in the Draft RMP and Figure 3 in this document show the proposed mineral withdrawals. The three areas identified for withdrawal include the Bonneville Salt Flats, the Knolls area, and Simpson Springs campground. These areas have unique resource values which would be threatened by mineral exploration and development.

29.2 BLM has never made the assertion that no gold of commercial value exists in Salt Lake, Utah and Tooele Counties. Quite the contrary, the Salt Lake District is proud of the role that public lands have had in the development of northern Utah and of the continued importance of the public lands to the well-being of these counties. The Resource Area has an extensive mining history and is discussed in some detail on pages 73-74 and 107-108 of the draft document. As was stated in the Draft RMP, we anticipate that mineral exploration will steadily increase in the foreseeable future.

29.3 BLM has documented that the Bonneville Salt Flats meet the criteria of "relevance and importance" as listed in 43 CFR 1710.7-2. The area designated through the 1984 MFP contains only the prime crust (halite crystal) that has been documented by a USGS study as diminishing due to man's activities. The area is managed as a Special Recreation Management Area for high-speed automobile racing and visual qualities for commercial filming. Due to the area's uniqueness and public demand for (non-surface disturbing) racing and filming, BLM has demonstrated its commitment to protect the fragile and limited salt resource base.

29.4 Although public lands may be involved in such actions, it is not a decision which BLM will make. As stated in the draft document, any increase in the size of the Goshute Indian Reservation would result from legislation in the U.S. Congress.

Comment Letter 30



United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
12795 W. Alameda Parkway
P.O. Box 25287
Denver, Colorado 80225-0287

IN REPLY REFER TO:

RMR-PP

AUG 15 1988

Memorandum

To: Salt Lake District Office, Bureau of Land Management, Salt Lake City, Utah

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Draft Pony Express Resource Management Plan and Environmental Impact Statement, Salt Lake District, Bureau of Land Management (DES-88/0023)

We have the following comments on the subject draft Resource Management Plan and Environmental Impact Statement.

30.1 The Deep Creek Mountains would be a fine addition to the national wilderness system. Unfortunately, the Pony Express Resource Area boundary bisects the range. The plan does not speak to a companion wilderness proposal for the rest of the range, which is in the next resource to the south. The entire range should be included in the wilderness area, because it would be very difficult to effectively manage half of the range as wilderness.

30.2 Generally, the preferred alternative (Alternative 2) seems appropriate. We would prefer the Off-Road Vehicle (ORV) Plan and mineral development plans outlined in Alternative 4. ORV users should have specific areas where the activity is permitted in order to minimize resource impacts.

30.3 The discussion on cultural resources should provide for a thorough baseline inventory and site-specific protection recommendations.

30.4 We would like to see a stronger commitment to wildlife habitat protection and active wildlife management. We believe that the strongest growth area in the Great Basin is recreation and tourism. Enhancement of recreation value, including wildlife habitat and visitor facilities, would do much for the long-term economic well-being of the area.

We appreciated the opportunity to review this generally well-prepared document.

Richard A. Strait

Response to Letter 30

30.1 The Deep Creek Mountains are being evaluated in total for possible addition to the wilderness system. See Response 20.2

30.2 Your preference is noted. While it would be the most restrictive on ORVs and mineral development, BLM feels that the designations identified in Alternative 2 and the Proposed Plan are more compatible with the present balanced-use objectives.

30.3 Based on the information on pages 50 to 51 of the Draft RMP, we believe that the document does describe measures that would provide both the inventory and site-specific recommendations.

30.4 While in some respects Alternative 3 would provide greater commitment to wildlife protection and management, Alternative 2 likewise makes a strong commitment to wildlife. The Proposed Plan will result in a significantly greater commitment to wildlife than was made under the Tooele Management Framework Plan. In addition, the wildlife proposals provide a better balance of resource related trade-offs for the greatest public good.

Comment Letter 29

to govern the right of way, lease permits, and other lane-use rights as we feel it would also shackel the industry.

29.5 We protest closing any of the Pony express route for the same reasons.

Respectfuly,

Joyce Palmer and A.W. Johnstun

Response to Letter 29

29.5 There is no reference in the draft document to a closure or withdrawal of the Pony Express Trail. As is clearly stated in the draft, the Pony Express Trail will remain open.

ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED PLAN

Minerals

Fluid mineral exploration and development would be controlled by standard stipulations on 1,732,095 acres, subject to special stipulations which could increase costs on 245,857 acres, and no surface occupancy which would increase costs on 77,003 acres. No land would be closed to fluid mineral development.

New potash leases would not be given on 104,814 acres closed to further leasing, precluding mineral recovery.

Withdrawal and closure of 127,000 acres to locatable mineral entry would prevent recovery of minerals from these areas.

Watershed

The disposal of 1,585 acres for agricultural use would cause a short-term increase in erosion. Up to 835 acres would be disturbed for military uses near Camp Williams, causing an increase in erosion. A total of 906 acres disturbed for community needs would eliminate these lands as watershed. Soil and vegetation would be permanently lost where facilities would be developed. On 756 acres developed for mineral extraction or processing, erosion would increase. Some soil and vegetation would be permanently lost.

Retention of 441,820 acres would enhance long-term watershed management.

Mineral exploration and development activities would cause erosion and soil loss on 1,732,095 acres in Category 1 and 245,857 acres in Category 2. Watershed values would be protected on 77,003 acres in Category 3.

ORV use could cause erosion and vegetation loss on 1,669,267 open acres. A total of 363,439 acres with a limited ORV designation would have significant protection from erosion, but minor erosion could still occur.

Watershed condition would improve on 1,388 acres where six grazing allotments would be elimated.

Wildlife

Land disposals would remove from Federal ownership 285 acres of crucial mule deer winter range and 44 acres of historical sage grouse strutting area. A total of 1,990 acres of pheasant habitat could be improved with the disposal of Tracts 31, 33 and 34. Chukar and antelope habitat would be lost with the disposal of Tract 17. On 441,820 acres that would be retained as public land with no land ownership adjustments, wildlife habitats would be preserved.

All crucial wildlife habitats would be adequately protected through Category 2 and 3 fluid mineral designations.

All crucial wildlife habitats would be adequately protected from ORV-related impacts through limited designations.

Recreation

Retention of the following areas with high recreation opportunities would assure that these opportunities continue: Bonneville Salt Flats, Deep Creek Mountains, Knolls, White Rocks, Horseshoe Springs, Simpson Springs, Rush Lake, and Ophir Canyon.

Roads associated with fluid mineral exploration could increase access for ORV users in Category 1 and 2 areas. A Category 3 designation would protect recreation opportunities at Simpson Springs and Middle Canyon. Category 3 and 4 designations would protect recreation values in the North Deep Creek Mountains, Stansbury Mountains, and Bonneville Salt Flats. ORVs would be allowed open travel on 1,669,267 acres and limited travel on 363,439 acres.

Visual Resources

Retention of the following areas in public ownership would protect their significant visual resources: Bonneville Salt Flats, Deep Creek Mountains, Horseshoe Springs, Stansbury Mountains, Tintic Mountains, and Ophir Mountains.

Fluid mineral leasing categories would protect all VRM Class II and III areas by preventing surface alteration. Class IV areas would not be protected.

Limiting ORV us on 363,439 acres would reduce impacts to visual resources.

Forest Resources

Approximately 3,400 acres of forest resource would be lost through land disposals.

Livestock Grazing

A total of 384 AUMs would be lost through disposals affecting 19 allotments.

Fluid mineral exploration could slightly decrease acres of livestock forage. Water wells constructed in association with fluid mineral activity could improve livestock distribution.

ORV use in grazing areas could decrease vegetation, resulting in increased erosion and invasion of undesirable plants. Unrestricted ORV use could harass livestock, particularly in the following areas: Five Mile Pass, Lake Mountain, Simpson Springs, White Rocks, Faust Canyon, Ophir Canyon, and Horseshoe Springs. Vandalism could occur in areas open to ORV use. Areas limited or closed to ORVs would be less affected.

Livestock grazing levels would not affect seral stage.

Cultural Resources

Disposal of 47 tracts could result in the loss of cultural resources. Retention of 441,820 acres would protect cultural values.

Exploration and development of fluid minerals could damage cultural resources on 1,732,095 acres in Category 1 and 245,857 acres in Category 2. Disturbance of cultural resources would be reduced on 77,003 acres in Category 3.

Cultural resources on 1,669,267 acres open to ORV use would be subject to ORV related impacts. Better protection would be afforded on 363,439 acres where ORV use would be limited.

Socioeconomics

Disposals would reduce in-lieu-of-tax payments to Tooele County by about $1,900 and to Utah County by about $1,250. This impact would be offset by taxation on disposed properties. Disposals would affect 19 grazing allotments, including six which would be eliminated. Individual operators could be economically impacted.

Unavoidable Adverse Impacts

Land disposals would cause the permanent loss of 9,008 acres. Public access and any resource values other than minerals would be lost.

Recovery of fluid minerals by directional drilling would increase operation costs on 77,003 acres included in the no surface occupancy category. Withdrawal of 127,000 acres would preclude recovery of locatable minerals. Closure of 104,814 acres to potash leasing would prevent new leases on these lands, but existing leases would not be affected.

Public lands closed or limited to ORVs would reduce access for mineral exploration and development. No land would be designated closed but ORV travel would be limited to existing roads and trails on 363,439 acres. Up to 1,000 acres of desert shrub and salt brush vegetation would continue to be lost each year to wildfire. This vegetation type would be replaced by invading annual grass. The likelihood of wildfire would increase proportionately since annual grasses are highly flammable when dry.

Natural erosion would remain at slight to moderate rates, but activities that disturb the land surface would cause increased erosion in some areas. Wherever mitigation and rehabilitation are not employed or not successful, permanent soil loss would result.

Crucial and critical wildlife habitats would be subject to damage in those areas open to ORV use, mineral development, and other forms of surface disturbance. Human activities in habitats during wildlife breeding, nesting, birthing, and rearing of young would reduce the level of success of these wildlife processes.

Some wildfires would not be containable at a size that would prevent significant resource damage to wildlife values. Loss of habitat acreage would result.

Some cultural or historical sites would be damaged or destroyed by surface disturbing activities. In areas open to ORV use and mineral development, artifacts would be susceptible to collection.

Designation of areas as limited or closed to ORV use would reduce recreation opportunities on 363,439 acres.

Revisions and Corrections

This section contains the revisions and corrections made to the Draft RMP/EIS. All page numbers listed below refer to the Draft document and are in numerical order.

Page 1, paragraph 4 under Alternative 1 change 1,962 to 1,890.

Page 2, column 1, paragraph 2, sentence 1, change to:

> Livestock would graze at active preference levels on three allotments and at a reduced level of 95 AUMs on three allotments affected

by land disposals.

Page 2, column 1, last sentence change 2,487 to 2,315.

Page 2, column 2, paragraph 3, sentence 1, replace with:

Livestock would graze at active preference on five allotments in Utah County. Grazing permits would be reduced or eliminated on seven allotments as a result of land disposals.

Page 2, column 2, paragraph 3, last sentence change 2,646 to 2,333.

Page 2, column 2, paragraph 9, replace with:

Livestock would graze at active preference on six allotments in Utah County. Grazing permits on the remaining six small allotgments with minimal or no actual livestock use would be cancelled. These allotments are Iso-tract Cook, Iso-tract Ludlow, Iso-tract Willes, Cherry Creek, Scofield, and Genola Hill.

Page 13, change table to read:

Utah County

Land Ownership	Acres Owned	Percent of Planning Area	Percent of County
BLM	79,854	1	7
Withdrawn BLM	45,434	1	4
Forest Service	463,025	7	39
State	39,433	1	3
Private	554,624	9	47
Totals	1,182,370	19	100

Page 16, Table 1-2, change:

Animal damage control for FWS to Animal & Plant Health Inspection Service, USDA.

Page 42, column 2, paragraph 3, sentence 3, delete sentence.

Page 42, column 2, sentence 4, delete existing sentence and replace with:

The existing leases are not affected by this closure and the lessee's rights as outlined in the leases are protected.

Page 42, column 2, sentence 5, add to end of sentence:

(Lines, USGS; UGMS; et al.)

Page 43, paragraph 4, last sentence, change to:

Private water rights and water rights applications on public lands will be evaluated to assure that necessary water is available for public use.

Page 48, paragraph 3, change "class" of livestock to "kind" of livestock.

Page 48, paragraph 5, change "class" of livestock to "kind" of livestock.

Page 48, column 2, item 2, change historic eyries to historical eyries.

Page 50, paragraph 2, last sentence, change to:

The areas are shown in Figure 2-3.

Page 53, column 2, legal description for Knolls Recreation Area, change to:

T. 1 S.

Page 54, last paragraph, sentence 1, change to:

Under this alternative, livestock would graze at active preference levels on three allotments and at reduced levels (95 AUMs) on three allotments resulting from proposed land disposals.

Page 57, paragraph 1, sentence 1 under Issue 3, change to:

Under this alternative, livestock would graze at active preference levels on five allotments.

Page 57, paragraph 1, sentence 2 under Issue 3, change to:

Grazing permits on the remaining seven allotments would be reduced or eliminated as a result of land disposals.

Page 59, Table 2-8 under Item 2, Vegetation Management Livestock, change the numbers in the alternatives as follows:

Alternative 1	2,149 to 1,890
Alternative 2	2,627 to 2,315
Alternative 3	2,592 to 2,333
Alternative 4	2,710 to 2,410

Page 65, Table 2-9 under Item 8, Livestock Grazing, change as follows:

Alternative 2	428 to 384
Alternative 3	276 to 236

Alternative 4 159 AUMs would be lost through elimination of livestock grazing on six allotments.

Page 73, column 1, paragraph 5, change to:

Potash leases held by Reilly near Wendover are the only active leases on public lands that are prospectively valuable for potash in the Pony Express Resource Area. The prospectively valuable mineral classification system, established by the USGS Conservation Division and now maintained by BLM, is based on "mineral occurrence in terms of quality, minimum thickness, and maximum subsurface depth, which if met, would suggest a mineral deposit is both technologically feasible and practicable to develop. The criteria are derived from present and past experience in extracting similar deposits from similar geologic environments." (BLM Manual 3021.1)

Page 73, column 1, paragraph 4, sentence 1, change to:

Most of the areas classified as prospectively valuable for solid leasable minerals are located within national forest boundaries along the Wasatch Front, within the West Desert Basin, and adjacent to the Great Salt Lake.

Page 73, paragraph 4, sentence 2, change "these" areas to "forest" areas.

Page 73, column 2, next to last paragraph, line 5, add uranium.end of paragraph:

An additional major furbearer present in the Resource Area is the bobcat.

Page 101, column 2, last paragraph, sentence 1, change to:

The peregrine falcon(*Falco peregrinus*), listed as Federally endangered in 1970, is a historic resident of the PERA.

Page 102, column 1, paragraph 1, sentence 2, change to:

A hacking tower was constructed in the Timpie Springs area and fledgling peregrine falcons were released in 1983, 1984, 1985 and 1986. In 1987, a pair of adult peregrine occupied the tower. In 1988 the first successful young peregrine was naturally raised by the nesting pair.

Page 110, column 1, paragraph 1, last sentence should read:

The greatest contributions to the economy from income from potash production near Wendover by Reilly Tar and Chemical, magnesium production near Lakeside by Amax, and the free use of sand and gravel by local governments.

Page 113, item 4, under Analysis Assumptions, add:

Generally, if seismic data indicated an exploration well should be drilled, construction of the well site and access road may disturb between 5 to 10 acres. The well site may be occupied up to 6 months and may take up to 3 years to rehabilitate. If the well is capable of production, the well site is rehabilitated to the extent that will accommodate production facilities. Additional step out or confirmation wells are drilled to determine the extent of the deposit. If a field of sufficient capacity is discovered, pipelines may be constructed to transport the oil and/or gas to a refinery. If commercial quantities are not encountered, the well is plugged and abandoned.

Page 120, column 1, paragraph 5, change to:

A total of 104,814 acres would continue to be closed to further leasing for potash until scientific data shows that potash development in the area would not damage the Bonneville Salt Flats. This would cause an impact to future development of potash in the closed area except development of existing leases. This impact would continue until further leasing in the area were made possible by reduction or elimination of the area presently closed, an action that must be based on supportive scientific data.

Page 121, Table 4-1, Fluid Minerals, change as shown.

Page 121, Table 4-2, Locatable Minerals, change as shown.

Page 122, Table 4-3, Non-Energy Leasables, change as shown.

Page 124, paragraph 3, sentence 2, change 1,962 to 1,890 and 76 to 74.

Page 124, paragraph 5, delete paragraph.

Page 127, column 2, paragraph 2, sentence 1, change 428 to 372.

Page 127, column 2, paragraph 3, sentence 2, change 186 to 130.

Page 132, paragraph 1, under Impacts on Livestock Grazing add to end of paragraph:

Reductions in active preference would occur on three allotments totalling 95 AUMs and ranging from 3 to 76 AUMs.

Page 151, 2nd column, insert the following paragraph under 1st line:

Salt brines in the area have been processed for extraction of minerals since pre-World War I years. Extraction continues with the main mineral product being potash.

Page 151, column 2, last paragraph, sentence 2, change to:

TABLE 4-1
FLUID MINERALS[1]

Alternative	Leasing Categories	Low to Moderate Potential Prospectively Valuable	Low or No Potential Not Prospectively Valuable
1	1 & 2	1,926,000 (93%)	78,000 (4%)
	3	27,000 (1%)	2,000 (-)
	4	39,000 (2%)	1,000 (-)
2	1 & 2	1,967,000 (95%)	78,000 (4%)
	3	25,000 (1%)	3,000 (-)
	4	0	0
3	1 & 2	1,992,000 (96%)	81,000 (4%)
	3	0	0
	4	0	0
4	1 & 2	1,967,000 (95%)	78,000 (4%)
	3	25,000 (1%)	3,000 (-)
	4	0	0

[1] Approximate acreages

TABLE 4-2
NON-ENERGY LEASABLES[1]

	PROSPECTIVELY VALUABLE (PV)				NOT PROSPECTIVELY VALUABLE
Alternative	OPEN Standard Limitation	TOTAL PV OPEN	TOTAL PV CLOSED	TOTAL PV	TOTAL NPV
1	599,000	599,000 (85%)	104,000[2] (15%)	703,000 (34%)	1,371,000 (66%)
2	599,000	599,000 (85%)	104,000[2] (15%)	703,000 (34%)	1,371,000 (66%)
3	599,000	599,000 (85%)	104,000[2] (15%)	703,000 (34%)	1,371,000 (66%)
4	596,000 ac.	599,000 (85%)	104,000[2] (15%)	703,000 (34%)	1,371,000 (66%)

[1] Approximate Acreages
[2] Bonneville Salt Flats - Highly Saline PV

TABLE 4-3
LOCATABLE MINERALS[1]

ALTERNATIVE	OPEN		CLOSED	TOTAL
	Standard Limitation	Year-Round Limitation		
1	2,037,000 (98%)	0 (0%)	37,000[2] (2)	2,074,000
2	1,939,000 (93%)	8,000 (-)	127,000[3] (6%)	2,074,000
3	2,037,000 (98%)	0 (-)	37,000[2] (2%)	2,074,000
4	1,948,000 (94%)	89,000 (4%)	37,000[2] (2%)	2,074,000

[1] Approximate acres
[2] Oil shale withdrawal, Bonneville Salt Flats Withdrawal, Simpson Springs Withdrawal
[3] Oil shale withdrawal, Bonneville Salt Flats, Simpson Springs, and Knolls.

This tree, unique in Utah and the Great Basin, is one of the oldest living organisms in existence.

Page 152, column 2, paragraph 2, sentence 2 change 100,000 years to 10,000 years.

Page 185, Appendix 6C Forage Distribution by Allotment, Alternative 3, place an asterisk by the following numbers:

888*

317*

Page 186, Appendix 6D, Forage Distribution by Allotment, Alternative 4, under Livestock Use Cattle, the total at the bottom of the column should be changed from 513 to 498.

Page 190, column 1, paragraph 6, sentence 3, change to:

Bald eagles are concentrated in the eastern part of Tooele County in Rush and Skull Valleys.

Page 190, column 1, paragraph 6, delete last sentence.

Page 194, 1st column, paragraph 4, delete sentence 7.

Page 202, Add the following to References:

1. Utah Geological and Mineral Survey, Donald T. McMillan. Bonneville Salt Flats: A Comparison of Salt Thickness in July 1960 and October 1974, Report Investigation No. 91, 1974.

2. "Lines Report" (see Response 14.8).

3. Dames and Moore, "Inventory and Market Analysis of the Potash Resources of the Great Salt Lake Desert, Utah", 1978.

4. UDOT, "Salt Flat Investigation," Progress Report Parts VI-XII, 1962.

5. Brine Production at Bonneville, Utah. A report prepared by Bradberry and Associates for Kaiser Aluminum and Chemical Corporation, 1966.

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